

TOMALES BAY STATE PARK GENERAL PLAN

Final Environmental Impact Report Responses to Comments

SCH #2003062074

Arnold Schwarzenegger
Governor

Mike Chrisman
Secretary for Resources

Ruth Coleman
Director of Parks and Recreation

State of California
The Resources Agency
Department of Parks and Recreation
P.O. Box 942896
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April 2004



California Department of Parks and Recreation

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1 INTRODUCTION

On January 30, 2004, the California Department of Parks and Recreation (Department) released to the general public and public agencies the Preliminary General Plan/ Draft Environmental Impact Report for Tomales Bay State Park (Park). The proposed General Plan will guide future management direction at the Park. It contains a comprehensive and integrated set of park-wide goals and guidelines for the long-term management of the Park that focus on protection of environmental resources, enhancements to visitor use and opportunities, and improvements to administration and operations of the Park. In addition, the General Plan includes area-specific management and facility prescriptions and proposes a range of new recreation facilities, which include, but are not limited to, overnight campgrounds, day-use areas, and trails.

The Draft Environmental Impact Report (EIR) that is included in the Preliminary General Plan contains the environmental analysis of potentially significant effects of the proposed project. Together, the Draft EIR and this response to comments document constitute the Final Environmental Impact Report for the project.

In accordance with Public Resources Code Section 21091 and CEQA Guidelines Section 15087, a 45-day public review period for the Draft EIR was provided. The public was advised of the availability of the Preliminary General Plan/ Draft EIR through public notices, a newsletter, and notification on the Department's web site. The public notice (Notice of Availability) was posted in the local newspaper, the Marin Independent Journal. Copies of the Preliminary General Plan/ Draft EIR were also available for review at the following locations: Marin County Civic Center Library, Point Reyes Station Library, Inverness Library, California State Parks Marin Sector Office and Northern Service Center, and on the State Parks web site.

The public review period ended March 14, 2004. During the public review period, comments on the environmental issues evaluated in the Draft EIR were received from (public agencies, private groups, and individuals). In addition, comments were also received on the various components of the plan itself. This document provides responses to written comments received during the 45-day public review period.

The focus of the response to comments is on the disposition of significant environmental issues that have been raised in the comments, as specified by CEQA Guidelines Section 15088(b), but also includes responses to pertinent planning considerations for implementation of the Preliminary General Plan.

All comments on the Preliminary General Plan/ Draft EIR and the responses thereto, are presented in this document, which is organized as follows:

- **Chapter 1** (Introduction) provides a brief overview of the proposed project, describes the requirements under CEQA for responding to public comments received on the Draft EIR, and describes the organization of the Final EIR.
- **Chapter 2** (List of Commenters) provides a list, in table format, of all written comments received on the Preliminary General Plan/ Draft EIR during the public comment period.
- **Chapter 3** (Response to Comments) provides a complete copy of, and responses to, written comments on the Preliminary General Plan/ Draft EIR received during the public review and comment period.
- **Chapter 4** provides a reproduction of portions of the Preliminary General Plan/ Draft EIR with revisions to text and graphics made either in response to comments or based on Department staff-directed changes that were made to update and/ or revise the document.

2 LIST OF COMMENTERS

This chapter provides a list of all public comments received on the Preliminary General Plan/ Draft EIR during the public review period, which ended on March 14, 2004. Section 2.1 focuses on written comments (i.e. letters, comment forms, and e-mail correspondence), and provides a table indicating the commenter/ agency that prepared written comments, the date the comment(s) were made, individual comments numbers, and the topic(s) raised in the comment (see Table 2-1). Responses to each individual comment are numbered correspondingly and are included in Chapter 3.

2.1 List of Written Comments Received on the Preliminary General Plan/Draft EIR

Table 2-1 indicates the letter number, commenter, and date of correspondence for each written comment received on the Preliminary General Plan/ Draft EIR. The letter(s) are numbered sequentially by date received. The letter numbers are then used as a prefix for individual comments, which are also numbered sequentially after the prefix. For example, comment 1.1 is the first comment of Letter 1, comment 1.2 is the second comment of the same letter, etc.

Table 2-1
Written Comments Received on the Preliminary General Plan/ Draft EIR

Letter	Commenter/ Agency	Date of Correspondence
1	Stephen L. Jenkins California State Lands Commission	March 8, 2004
2	Pat Latimer	March 4, 2004
3	Michael Mery	March 9, 2004
4	Bridger M. Mitchell	March 10, 2004
5	Carrick and Andy McLaughlin	March 10, 2004
6	Julie C. Monson	March 8, 2004
7	Anne Baxter Environmental Action Committee of West Marin	March 8, 2004
8	Kaitilin Gaffney The Ocean Conservancy	March 12, 2004
9	Jana Haehl Marin Conservation League	March 12, 2004
10	Rick Johnson	March 12, 2004
11	Jennifer Chapman	March 12, 2004
12	Scott N. Kivel	May [sic] 12, 2004
13	Sharon Morgan Blakley	March 13, 2004
14	Deb Hubsmith Marin County Bicycle Coalition	March 12, 2004
15	Thomas G. Baty	March 12, 2004
16	Susan and John Van Der Wal	March 11, 2004
17	Marshall and Jennifer Livingston	March 10, 2004
18	Donna Sheehan	March 11, 2004
19	Jeanette Marie Pontacq	March 10, 2004
20	Suzanne G. Baty	March 12, 2004
21	Neysa King The Tomales Bay Watershed Council	March 12, 2004
22	Mary E. Zimmerman	March 10, 2004
23	Gordon Bennett Sierra Club Marin Group	March 12, 2004
24	Eric J. Larson California Department of Fish and Game	March 18, 2004
25	Don Neubacher National Park Service, Point Reyes Nat .Seashore	March 12, 2004
26	Kenneth J. Fox Tomales Bay Association	March 12, 2004
27	Timothy C. Sable Department of Transportation	March 15, 2004
28	A. Marc Commandatore Department of Health Services	March 15, 2004



Arnold
Schwarzenegger
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Deputy
Director

March 16, 2004

Gudrun Baxter
Department of Parks and Recreation
One Capitol Mall, Suite 500
Sacramento, CA 95814

Subject: Tomales Bay State Park General Plan
SCH#: 2003062074

Dear Gudrun Baxter:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 15, 2004, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Terry Roberts
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
(916)445-0613 FAX(916)323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2003062074
Project Title Tomales Bay State Park General Plan
Lead Agency Parks and Recreation, Department of

Type EIR Draft EIR
Description The general plan provides long-term goals, guidelines, and directions for the operation, development, management, interpretation and resource management for this state park.

Lead Agency Contact

Name Gudrun Baxter
Agency Department of Parks and Recreation
Phone 916-445.8909 **Fax**
email
Address One Capitol Mall, Suite 500
City Sacramento **State** CA **Zip** 95814

Project Location

County Marin
City
Region
Cross Streets Sir Francis Drake Boulevard/Pierce Point Road
Parcel No. various
Township 3N **Range** 9W **Section** 7 **Base** MDM

Proximity to:

Highways 1
Airports
Railways
Waterways Tomales Bay, Lagunitas Creek, Millerton Gulch
Schools West Marin Elementary, Inverness Elem.
Land Use Tomales Bay State Park/Recreation

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Flood Plain/Flooding; Forest Land/Fire Hazard; Noise; Coastal Zone; Growth Inducing; Landuse; Population/Housing Balance; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 3; Department of Forestry and Fire Protection; San Francisco Bay Conservation and Development Commission; Department of Water Resources; Caltrans, District 4; California Highway Patrol; State Water Resources Control Board, Division of Water Quality; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; State Lands Commission

Date Received 01/30/2004 **Start of Review** 01/30/2004 **End of Review** 03/15/2004

Note: Blanks in data fields result from insufficient information provided by lead agency.

3 RESPONSE TO COMMENTS

This chapter provides a complete copy of the written comments received on the Preliminary General Plan/ Draft EIR for Tomales Bay State Park, and presents responses to significant environmental issues raised in the comments, as required by CEQA Guidelines Section 15132, as well as comments pertaining to the Preliminary General Plan.

This chapter focuses on written comments received on the Preliminary General Plan/ Draft EIR, including letters, comments forms, and e-mail correspondence. Each letter is reproduced in its entirety, including attachments. Each letter and comments are labeled numerically, and correspond to Table 2-1. The responses to comments are also labeled numerically and follow each letter.

STATE OF CALIFORNIA

ARNOLD SCHWARZENEGGER, Governor

CALIFORNIA STATE LANDS COMMISSION

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Sacramento, CA 95825-8202



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Contact FAX: (916) 574-1885

March 8, 2004

File Ref: SCH No. 2003062074

Ms. Nadell Gayou
The Resources Agency
901 P Street
Sacramento, CA 95814

RECEIVED

MAR 09 2004

NORTHERN SERVICE CENTER

Ms. Gudrun Baxter
Department of Parks and Recreation
One Capitol Mall, Suite 500
Sacramento, CA 95814

SUBJECT: Preliminary General Plan/Draft Environmental Impact Report
for the Tomales Bay State Park, Marin County

Dear Ms. Gayou and Ms. Gudrun Baxter:

Staff of the California State Lands Commission (CSLC or Commission) has reviewed the proposed Draft Environmental Impact Report for the subject project. The CSLC is a responsible agency under the California Environmental Quality Act. Based on this review, we offer the following comments.

Jurisdiction

The State acquired sovereign ownership of all tidelands and submerged lands and beds of navigable waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all the people of the State for statewide Public Trust purposes which include, waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. The landward boundaries of the State's sovereign interests are generally based upon the ordinary high water marks of these waterways as they last naturally existed. Thus, such boundaries may not be readily apparent from present day site inspections. The State's sovereign interests are under the jurisdiction of the CSLC.

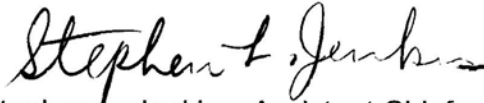
1.1

Ms. Nadell Gayou
Mr. Gudrun Baxter
Page 2

Therefore, any facilities located in the water and along the shoreline maybe located on sovereign lands for which a lease would be required; also much of the Marconi Cove recreation area could be located on filled sovereign lands. Please contact Nanci Smith, Public Land Management Specialist, at (916) 574-1862 if you have any questions regarding the Commission's leasing process.

1.1

Sincerely,



Stephen L. Jenkins, Assistant Chief
Environmental Planning and
Management Division

cc: Nanci Smith

Response to Letter 1

Stephen L. Jenkins, California State Lands Commission

March 8, 2004

- 1.1 The Department and the State Lands Commission have determined the property boundaries at Marconi Cove. California State Parks owns the land up to the bay's "ordinary low water mark," in the vicinity of the line of rip rap on the west side of the property.

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3/4/04

MAR 09 2004

NORTHERN SERVICE CENTER

Calif. State Parks, I was horrified to read in the light you thought of a "Hike or Bike Loop" trail at Millerston. This is an awful idea, as it is one of the only places people in the area feel safe to walk their dogs. Dogs + Bikes don't work well together.

2.1

Please, you've taken about every place I love (Walden Dam, etc etc.) & all this would do at Millerston is attract MORE TOURISTS. People who regularly walk their dogs there don't need or want this. We won't stand for it. In my opinion the park should blow out. In the 25 years we've been here, you have made it less & less desirable by taking away so much & appealing to only tourists. Leave the ranches alone, too! Fix up some of the old places you've gobbled up & just let go to Hell!

Sincerely
Pat Latimer
P.R.S.

Response to Letter 2

Pat Latimer

March 4, 2004

- 2.1** The “Hike and Bike Loop Trail” is not being planned for the existing informal loop trail at Millerton Point. The “Plan Proposals” map on page 9 of the General Plan shows that the “Hike and Bike Loop Trail” is proposed for the now undeveloped **Millerton Uplands** where there is currently no public access. The plan’s proposal for a “Hike and Bike Loop Trail” in the Millerton Uplands will have no direct effect on the Millerton Point trail. Currently, bicycles are not permitted on this trail, and the General Plan does not propose bike use in this area. The plan’s proposals may attract more visitors from outside the local area or may redirect recreational use patterns in the region by providing more access and facilities. Providing new recreational opportunities for Californians on the east side of Tomales Bay was one of the main reasons that State Parks acquired the recent acquisitions in this area.

RECEIVED
MAR 10 2004
NORTHERN SERVICE CENTER

March 9, 2004

Tomales Bay State Park General Plan
Bob Hare, Northern Service Center
One Capitol Mall, Suite 500
Sacramento, CA 95814

Re: Comments on Tomales Bay State Park General Plan

Dear Mr. Hare:

It was a pleasure to meet with you and your colleagues on February 24th in Point Reyes Station. The General Plan and background materials provided in mailings, via the Internet, and at the outreach evening have been very helpful, and we appreciate this opportunity to comment.

The comments below will extend the comments of our May 16th, 2003, letter and will be organized in a similar fashion for your convenience in comparing the two documents. New comments will be underlined.

Heart's Desire Area Possibilities

1. Estuary and parking. We applaud the goal of restoring the natural outlet of the estuary and (presumably) reconfiguring the parking. We certainly do not object to alders, and we recognize their role in supporting a healthy streambed, but we also believe that alders are almost certain to re-establish themselves quite handily without the benefit of encouragement, so we hope no one will misguidedly undertake a large-scale alders planting effort. We are concerned, however, about the bathroom facilities, the relationship of those facilities to the proposed creek restoration and possible water quality issues. It is our understanding that the current septic system is inadequate to handle the effluent from heavy weekend use. Additionally, the current leach lines are near the stream bed. We would raise the following, which may be thought of as both questions and tentative suggestions:

3.1

- a. Relocate the bathrooms to the edge of the parking lot opposite the current position.
- b. Consider pumping the effluent up the hill to a suitable area where the soils are appropriate, unlike the current situation. Size the system to accommodate any changes in the current camping area disposal system to include both the camping area and the beach bathrooms.

These changes would allow for an improved stream restoration plan and would resolve the effluent issues associated with the current bathrooms.

2. Campgrounds. We support development of the former "bike-and-hike" campground as a group campground, especially for use by children and youth groups on educational field trips. It is our understanding that the State Park guidelines specify that each campsite should accommodate a maximum of 8 people. In that the current camping area has 5 sites, that allows for a maximum of 40 campers. It may be useful or appropriate to reconfigure the campsites, but expanding the number of sites does not seem necessary at this time. Plans for conversion of the upper mainte-

3.2

nance storage lot into a public campground should be kept in perspective with the size and scale of usage of the Heart's Desire Area. We strongly urge that the number of camp sites be limited to 10-15 (absolute maximum of 15), and that these be specifically designated as tent campsites, not RV sites. We do not feel that the Heart's Desire Area is large enough to support the sort of campsite usage that occurs inevitably when RV camping is permitted. We are comfortable with a drive-in campground, so long as the drive-ins are limited to passenger vehicles. (Do you have adequate water to support even 15 campsites?) We have several questions/comments about the proposed new campground.

3.3

a. We understand that there has not been a biological inventory of the site and the areas adjacent to the site. Any planning should await such an inventory.

3.4

b. Does the park have an adequate water supply for any new campground.

3.5

c. How will campers get to the beach areas from the proposed site. A trail does not seem practical and the current road does not have shoulders adequate to provide safe walking access to Heart's Desire.

3.6

d. We understand that the State Park's definition of a 'drive in campsite' implies sufficient parking for two cars adjacent to the site. We would see such 'car camping' as inappropriately high impact for Heart's Desire. The result would likely be campers with generators and the various appliances which sophisticated vehicles bring with them.

3.7

e. Finally, we have seen no data indicating the demand for such facilities. The Heart's Desire portion of TBSP has a long history of very successful, relatively low impact use with minimal staffing needs. The changes proposed are very significant and would seem to require much further study prior to any decision. It is of interest that in the recent scoping meetings for the Seashore General Plan Update there were no comments in the over 1000 submitted asking for car camping.

3.8

Group picnic area. A modest improvement in the group picnic facilities at Heart's Desire would be welcome (e.g., installing larger, group-size BBQ stoves), but we don't believe the park should attempt to provide facilities for very large groups, inasmuch as such usage would be out of character with the essentially "family" nature of Heart's Desire. What would be ideal is a configuration that is suitable for groups but that also supports use by individual families when there are no group reservations.

3.9

4. Connecting to PRNS trails. Connecting State Park trails with National Seashore trails for a more extensive network of hiking opportunities is a laudable goal. We favor especially extending the Johnstone Trail to support a connection to the PRNS fire road that goes towards Mt. Vision.

5. Recreational boating on Tomales Bay. There is growing unease over the lightly regulated use of Tomales Bay for recreational boating, particularly by commercial interests (such as kayak rental companies and sport fishing boats). Kayaking on Tomales Bay in particular should be of interest to Tomales Bay State Park, because some kayakers launch from the Heart's Desire Beach itself and a large percentage of kayakers on the Bay put in along the TBSP shoreline (especially at TBSP recreational beaches). A particular bone of contention is the use of publicly-owned land (such as highway shoulders) by kayak rental companies for commercial purposes, including also their use of parking spots in the Heart's Desire Beach parking lot. (Although the intensity of rental kayaking appears to be leveling off, private kayaking appears to be on the increase.) Among other problems that cry out to be addressed more comprehensively and with better inter-agency coordination than is occurring at this time are restroom facilities, shoreline camping by boaters, contention between swimmers and kayakers for water "space," use of generators at night on anchored live-aboard boats, pumpout facilities, etc. The General Plan should acknowl-

3.10

edge State Parks’ awareness of these boating issues and commit the State Parks to working with other agencies that also have jurisdiction over Tomales Bay to resolve the various problems.

(3.10)

6. Staff housing. We believe that it is very important to provide on-site staff housing in the Heart’s Desire Area of TBSP, but it should be embarrassingly evident that the current staff housing at Heart’s Desire is overdue for replacement (or at least refurbishing and being made more habitable).

3.11

Inverness Area Possibilities

7. Connecting to PRNS trails. As noted in No. 4 above, we endorse the concept of connections between the two parks’ trail systems, but there are serious practical issues in the Inverness area. Principal PRNS trails west of the State Parks’ Inverness Area are fairly limited, consisting in the main of a not-all-that-well-maintained ridgetop trail that runs parallel to and in most areas quite close to Vision Overlook Rd. (aka Mt. Vision Rd.), and spur trails to such attractions as Mt. Vision itself and ponds, etc., west of the road. Most use of these trails by non-locals is for short “stop-and-stretch-the-legs” jaunts by folks driving through the park. Our point is that few people would be coming from PRNS trails onto trails in the State Parks’ Inverness Area; the more intensive usage would be in the other direction, with usage originating on the Inverness side of the Ridge. Following are some of the practical issues that should be considered in deciding whether or not to launch an extensive trail-development program within the State Parks’ Inverness Area:

- a. Very limited opportunities for developing requisite trailhead parking facilities. (Please see the comments below on North Dreamfarm, #8.)
- b. Much of the mapped trail network in the Dreamfarm area is historical, but most of these trails have not been maintained for decades; the reality is that most of them do not really exist anymore, so extensive development would be required.
- c. Challenging topography: It gets deceptively steep and rugged in this area, especially above Dreamfarm, so in places you’ll find yourselves developing several linear miles of trail to cover one mile of distance.
- d. Intrusion onto private property. Substantial private development has occurred in recent years adjacent to the Park’s Dreamfarm area holdings, and it would be challenging to develop trails here that you could ensure would not contribute to significant trespass onto private property, especially in cases where the “natural” route goes through homesites.

3.12

The most popular trails in the State Park holdings north of the Nature Conservancy lands are the lateral fire roads that are maintained by the Inverness Public Utility District (for access to the IPUD Water System’s watershed facilities) and the fire road from the Perth Way gate to the Mt. Vision parking lot in the National Seashore (which is maintained cooperatively by the IPUD, TBSP, and the PRNS for fire and other emergency access). There are remnants of older narrow hiking trails here and there in this area, but most of these were gully-wash trails that are better off left reverting back to their natural state. The so-called Lewis trail hardly exists anymore and was deliberately designed to be too challenging for general-public use (it was one of those “local secret” types of trail with a concealed trailhead).

A key constraint to development of trails in this area is the odd configuration of the State’s holdings. It would be virtually impossible to create any new trail that did not pass over the IPUD watershed lands, which would potentially create conflicts with the IPUD’s obligation to safeguard the town’s water supply. We suggest that the existing, nicely maintained fire roads above the town of Inverness suffice in this sector, and we don’t see that there is much practical opportunity for additional trail development in the Inverness Area of TBSP.

8. North Dreamfarm Property. Removing derelict buildings and trailers should be viewed for more immediate implementation than as a long-term planning goal; in fact, such work should be undertaken at the earliest opportunity as hazard and attractive-nuisance abatement. Development of park staff residence(s) in this area seems a practical objective, but a maintenance facility does not impress us as reasonable, in large part because it would be too remote from the areas you would be maintaining. Principal maintenance requirements are always going to be in the Heart's Desire Area and on the East side of Tomales Bay; a maintenance facility that is not close to either of those areas would not be very efficient. We would add that the proposal to develop the Dreamfarm area seems inappropriate at this time. First, the access road is one lane and is immediately south of a blind corner. Entering or leaving N. Dreamfarm Rd. is fairly hazardous to the few residents who use it for access. Widening the road would require filling the wetland immediately adjacent to the road. Additionally, the Dreamfarm property is not contiguous with the State Park holdings at higher elevations south and west of Dreamfarm. Any trail access would require easements, a complicated process at best. Finally, the higher elevation area is part of the Inverness Watershed and its protection is essential for the Inverness water supply. The lowest possible impact would seem the most appropriate choice. We do not lack for hiking opportunities and the addition of more trails does not seem advisable. (See below for earlier and still pertinent comments.)
9. Fire hazard risk. It was indeed on State Park property in the upper Dreamfarm area where ignition of the Vision Fire occurred on October 3, 1995. The result was conflagration of 12,350 acres and loss of 44 homes. Thus, any proposal that intensifies public use of Inverness Ridge lands must address the increased risk of fire that is concomitant with more people being introduced into a wildland area. The Inverness Ridge is one of the most potentially volatile wildland-urban interface (WUI) areas in the entire country, and any planning for this area must recognize the risk factors involved. The Vision Fire burned into only a corner of the Inverness community's watershed (thanks to heroic firefighting efforts and fortuitous weather patterns), but subsequent study has clarified that the nature of this watershed is that it provides what is primarily a *seepage* source of supply for the town. It would be a disaster of frightening consequences if a fire were to destroy the forest's protective canopy and the centuries-old accumulation of packed forest floor duff that constitutes the giant "sponge" that stores the rainfall that provides the town with its water. The rainfall that today is captured in the "sponge" would instead run off quickly, not only creating erosion problems, but also leaving the community without a water supply in the dry-weather months. We cannot overstate how important it is to the local community that planning for State Park facilities be cognizant of the threat of wildland fire.
10. Inverness Watershed Area. This is the oddly-shaped "remnant" portion of the TBSP holdings north of the Nature Conservancy property and west of the town of Inverness (accessed via Perth Way). It is certainly the case that our organization and the entire town of Inverness will be forever grateful to the State Parks System for "rescuing" these lands from the private development that was on the brink of occurring in the 1970s. However, even a cursory glance at the map reveals that the result 30 years later is a cartographic nightmare. At the time the State Parks stepped in, the core of this area was held as watershed by the Inverness Water Company, a for-profit subsidiary of a multi-state utility corporation. During the 1960s, as much of the historic watershed lands as possible had been excluded from watershed protection, and by the early 1970s these "carved-out" areas were in the process of subdivision. However, these areas constituted essentially the "periphery" of the essential watershed acreage, and their boundaries made little sense topographically. It was this convolution of "remnant" areas that State Parks acquired.

It seems to us that today's general-planning for TBSP provides the opportunity to consider the question of consolidating these lands. In 1980, the Inverness Public Utility District acquired the

3.13

3.14

3.15

Inverness Water Company and with it the core watershed lands. This means that these watershed areas, which are surrounded by the spaghetti-like State Park holdings, are now also in public ownership, unlike the situation at the time the State Parks acquired the periphery acreage. The IPUD Water System's fire roads, which also constitute popular hiking trails, pass back and forth between the IPUD's lands and the Parks' lands. It would make a great deal of sense to merge these holdings under a single ownership, administration, and maintenance responsibility. Inasmuch as the IPUD's portion is essential as watershed and is visited and maintained by IPUD personnel on a daily basis, and inasmuch as the odd configuration of the State's portion precludes much in the way of practical usage by the State Parks (indeed, the current general plan "menu" of possibilities includes no specific proposals at all for this area), the most sensible approach would be for State Parks to consider talking to IPUD about the possibility of a formal transfer to the IPUD of these parcels (Marin County A.P. Nos. 109-140-39, 109-150-07, and 109-330-30). We urge that this possibility be incorporated explicitly into the General Plan menu of possibilities.

3.15

11. Horseback riding. Matrix #3 mentions "horseback riding" as an "appropriate" activity in the Inverness Area. We are adamantly opposed to explicit promotion of equestrian use. There are no adequate facilities for horse-trailer parking, horse hoofs destroy the hardpack surface on fire roads that is necessary for their emergency use by fire engines and for proper channeling of runoff, and most existing trailheads are reached via narrow, often steep, windy residential streets that are not conducive to confrontations between residents and strings of sometimes aggressive equestrians.

3.16

Millerton/Tomasini Point Area Possibilities

12. Millerton Uplands. We are concerned about Coastal Act and Local Coastal Program issues with respect to development east of Hwy 1. The suggestion of a parking lot is troublesome, because of such a facility's potential for intrusion into the viewshed from the Bay itself and from public viewing places on the west shore. The proposal for a loop trail is appealing, but we would prefer that parking remain exclusively on the west side of the highway (in other words, there should be a single parking lot for Millerton Point and the Millerton Uplands). The plans for the holdings on the East side of Tomales Bay are not directly relevant to the Inverness Association because those properties are outside of our Planning Area. However, the 'broad brush' plans presented at the meeting in Pt. Reyes Station seemed of relatively low impact and are worthy of further discussion.

3.17

We wish to note that we are impressed by the Parks System's outreach in involving the public in the General Plan process, and we were especially pleased that your personnel appeared to be genuinely receptive to receiving and considering the opinions and suggestions of the public. We were glad to see so many staff members at the meeting and the thoroughness of the maps and other printed material. We do feel that significant further discussion is needed on all the proposals and that many of the proposals are far from complete. We look forward to remaining involved in the process as this important General Plan work evolves.

3.18

Cordially,

Michael Mery
Design Review

Response to Letter 3

Michael Mery

March 9, 2004

- 3.1** In response to your comments concerning the water quality issues in the Heart's Desire Area the following guideline, HD-13, will be added to the General Plan on page 166.

HD-13 Upgrade Heart's Desire Beach Restroom Waste Disposal System

The Heart's Desire Beach restroom waste disposal system should be upgraded to meet demands during peak use periods. Alternative methods shall be explored for waste disposal that affords adequate protection to stream habitat and maintains high water quality.

The Department considered the option of removing the existing Heart's Desire restroom to protect the archeological site it was built upon in the early 1960s, but determined that removal would have more detrimental impact on the site than leaving it where it is.

- 3.2** In response to your comments concerning campgrounds, the following guideline, HD-7, will be changed on page 165 as follows:

HD-7 Adapt former Hike-Bike Campground to a Group Campground

This site could be easily adapted to function as a group campground (approximately 40 people), which would help address the local deficit of this kind of public camping experience in the West Marin area.

- 3.3** In response to your comments concerning the campground at the Heart's Desire Area, the following guideline, HD-8, will be changed on page 165 as follows:

HD-8 Develop Small Drive-in Campground above the Entrance Station

The current park maintenance storage area (the "boneyard") is a suitable location for an approximately 15-site (maximum) drive-in campground for small vehicles. The campground could include some "walk-in" sites, a campground host site, and a small campfire center. This campground would help address the local deficit of this kind of public camping experience in the West Marin area.

- 3.4** The Department routinely conducts a biological survey for development projects during the project-level planning, design, and implementation phase. Projects also require a subsequent environmental assessment to determine potential impacts on sensitive resources and required mitigation and monitoring.
- 3.5** The Department will conduct a more in-depth assessment of water sources and availability during the project planning and design phase. Cost feasibility and alternatives will be explored at that time.
- 3.6** It is likely that most campers would drive to the beach, as most visitors do currently.
- 3.7** The Department's intent as stated in Guideline HD-8, is for a small campground that will accommodate small vehicles. The Department has design flexibility to control the size, number, and location of vehicles at such a campground to avoid vehicle impacts on the resource sensitivities of the site. Park staff have the authority to regulate use of noise-producing appliances such as generators in order to mitigate noise impacts. Please refer to **Response 3.3** for additional information regarding camping in the Heart's Desire Area.
- 3.8** The need for additional car camping in West Marin County is demonstrated by the number of visitors seeking car campsites who are turned away at S.P. Taylor State Park, the only public car camping area in Marin County. The Department shares your interest in maintaining low impact types of recreation facilities at this unit, and also believes that we can develop and manage this type of facility toward that objective.
- 3.9** The group picnic area is proposed to be re-designed in a flexible and efficient manner which will accommodate groups, families, and individuals. The General Plan discusses the potential group picnic area on the bluff (Vista Point) in the Heart's Desire Area on page 165, in Guideline HD-6.
- 3.10** In response to your comments concerning recreational boating on Tomales Bay the following guideline, COM-5, will be changed on page 161 as follows:

Coordinate regional resource and recreation planning, development, and management issues such as trail connections, water and boat access, the Highway 1 scenic corridor and wayside stop access points, camping, land acquisition, water quality, commercial aquaculture, wildfire and prescribed burning issues, exotic plants and animals, biocorridors, traffic issues, and the scenic and aquatic

resources of Tomales Bay. State Parks will coordinate with appropriate agencies to address the complex issues of Tomales Bay recreation, water quality, and wildlife preservation. Some of the outstanding issues include: boating access, sanitary facilities, shoreline camping, noise, and disturbance of marine mammals and seabirds.

- 3.11** The Department will maintain its existing staff housing at this site. Such ongoing maintenance does not require any general plan language to support it. Guideline OPS-3 on page 158 supports maintenance of park housing.
- 3.12** Thank you for your comments on trail possibilities in the Inverness Area. The Department will consider these helpful comments during any future planning process to determine the practicality of and/ or design for any trail development that may occur in this area concerning park land.
- 3.13** Thank you for your comments on the North Dream Farm property and any new trails that might be developed from this site. The Department will consider your comments during any future planning process to determine the practicality of and/ or design for any public day-use facility or trail development that may occur in this area.

Please note that Guideline INV-1 supports the continued protection of watershed, viewshed, and wildlife values on the Department's Inverness Area parcels.

Also note that a maintenance facility is not proposed for this site in the General Plan.

- 3.14** The General Plan has considered the potential impacts of developing campgrounds in areas that have a high potential for wildfire in the dry months of the year. The Environmental Analysis discusses this potential on pages 210–211 of the General Plan, and recommends potential mitigations to reduce the possibility of wildfire in the park. Included in these are the development of a Wildfire Management Plan to address strategies such as the creation of defensible space around structures, the development of wildfire education programs, and the further development of emergency actions for the protection of public safety, park structures, and adjacent landowner structures.

The General Plan addresses potential impacts to wildlife habitat from facilities development in its natural resources management goals and guidelines for the park (see page 128 and Guidelines WIL-1, WIL-6, WIL-8, and WIL-12), and in the Environmental Analysis section, on pages 203-

204. Examples of proposed mitigation for potential impacts to habitat in the park include managing marine and terrestrial environments to protect and perpetuate these ecosystems according to Department policies (WIL-1), establishing appropriate setbacks on development for riparian zones (WIL-11), and removal of in-park barriers to natural hydrologic flow patterns (WIL-8).

In addition, implementation of plan proposals with increased risk of wildfire or habitat disturbance must go through a California Environmental Quality Act (CEQA) process that evaluates potential negative impacts to resources and proposes mitigation measures for those impacts, which, when approved, must be implemented as part of the project.

- 3.15** Please note that Guideline INV-5 (page 168) supports “Discussions with The Nature Conservancy, the National Park Service, and the Inverness Public Utility District [to] consider the best way of managing these contiguous land holdings in the Inverness Ridge area for the highest public good. Options for more effectively meeting common needs for watershed, wildlife, habitat, fire management, and recreation could be discussed. Options could include investigating the benefits of land transfers, operating agreements, easements, and Memoranda of Understandings (MOUs).”
- 3.16** Please note that there is no Matrix 3 in the General Plan. The commenter may be referring to Appendix B on Page 243. Staff-directed changes for this table, strike out references to “Equestrian” under the “Comments” Column for Row 14, “Jepson Trail” and Row 15, “Johnstone Trail”.
- 3.17** Guideline MIL-3 supports using the existing parking on the west side of Highway 1 to support the proposed Millerton Uplands trail at its southern end. The text reads: “Ideally, the existing trailhead sites could be used with modification.” Existing text also emphasizes the importance of considering aesthetics and viewshed if a new trailhead is needed east of Highway 1: “If safe access to the east side of Highway 1 is not feasible from the current Millerton Point parking lot then a new modest-sized and sensitively located and screened parking lot and restroom facilities could be built on the east side of the highway near the entrance to Sheep Ranch Road.” Future assessments will determine the most effective, safe, and least impacting design for any public day-use facility or trail development that may occur in this area.
- 3.18** The General Plan is a first-tier environmental document. The Department’s General Plan proposals will be supplemented with additional assessments and further public review when subsequent-tiered environmental documents are developed in the future. As discussed on page 23, *Purpose, Scope, and Process of this General Plan*, this General Plan is a broad policy document that sets the direction and provides the

vision for the park's management and development. General plans provide general direction for the park while avoiding specific details that could change before a project could be funded and implemented. The purpose of the plan is to provide a framework for the park's development, ongoing management, and public use. The goals and guidelines presented in the General Plan are designed to guide resource stewardship, facility development and interpretation, and future land use management for the park. It is meant to be broad in scope.

BRIDGER M. MITCHELL

60 Hayfields Rd.
Portola Valley, CA 94028

March 10, 2004

California State Parks
Northern Service Center
attn: Bob Hare
P. O. Box 942896
Sacramento CA 94296-0001
via: rhare@parks.ca.gov

RECEIVED
MAR 12 2004
NORTHERN SERVICE CENTER

Re: Tomales Bay State Park General Plan

Dear Mr. Hare,

This letter responds to the invitation to review and comment on the February 2004 documents (Preliminary General Plan, Draft Environmental Impact Report) for the Tomales Bay State Park General Plan in the CEQA process.

The guidelines enumerated in these draft documents focus on development of *facilities* for public access and enjoyment of the park, but provide virtually no discussion of *staff and budget resources* necessary to manage the increased public use of the park and the expanded facilities envisioned in the plan. I fear that this may be indicative of a systematic bias in the Park Service's planning process itself that, unless corrected with *committed* funding, will jeopardize the natural resources that the park exists to preserve, adversely impact the environment of the park, and further endanger the surrounding communities.

4.1

I am the trustee of private property that shares a border with the park at the Shell Beach parking lot. It has been our experience for several years that the park staff is stretched so thinly that they are unable to patrol and enforce restrictions on the use of the park's property at Shell Beach after dark. Overnight camping and group substance abuse have occurred with some frequency on park property. Campfires, which are evidenced by charred logs and branches, pose a potentially grave risk to both the park itself and to the nearby Inverness Seahaven area residents. Violators have chopped down limbs and trees and torn apart wooden park structures. The park service has often been unable to respond to reports of these violations. These statements can, I presume, be corroborated by sheriffs' and rangers' telephone logs of reported incidents and park patrol logs.

The environmental and property risk from illegal campfires on public property is intensively real, and immediately apparent to any Tomales Bay resident who witnessed the Mount Vision fire. Voluminous documentation of that destruction, caused by a single unpatrolled campfire, is available from the National Seashore and local newspapers.

Staffing at the Tomales Bay park has been reduced. It is apparent that, at current levels, the staff is unable to maintain service to the public and also to carry out maintenance of trails and facilities and the reduction of fire risks. Consider the "derelict buildings and trailers" which were installed by the park service and now form part of the current park property in the Inverness parcel. Why has the park service been unable to maintain them?

Before efforts are launched to add facilities and attract additional visitors to the park, it is essential that park staff resources *first* be restored to a level commensurate with the *current* volume of visitors and the hazards they create. Any expansion of public access, such as that envisioned in the General Plan, will necessarily require still greater staffing.

4.2

Three of the guidelines (HD-7, HD-8, MC-2) call for establishment or reactivation of campgrounds. Overnight use of the park raises very troubling concerns at a time when budgets are so clearly inadequate. Camping with it attendant cooking fires, campfires, and vehicular access would require overnight supervision by resident park rangers at the campgrounds whenever they are open, and also require nightly patrols throughout the year to prevent unauthorized use of park facilities when closed. As noted above, park beaches that have never been authorized for camping are presently being used illegally for open fires and overnight accommodations.

4.3

Any change from the current day-use only policy for Tomales Bay State Park requires ironclad commitment of increased funding for additional year-round staff resources. It is not sufficient to say (OPS-1) that the plan will "strive to ensure that operational and maintenance budgets keep pace with proposed development." It is essential that your planning process forthrightly address the budgetary implications of any recommendations, as well as the current shortfall.

4.4

Inadequate funding for vegetation and fire management operations already threatens key environmental values in the park and community structures nearby. As the plan observes, the buildup of fuels in the park has gone largely unchecked, so that the developed area (Seahaven) immediately adjacent to the major park area is at high risk of rapidly spreading wildfire, should one ignite. I understand that, after several years of effort, state funding and approval of a fuel break project along the TBSP/Seahaven border has finally been obtained. This project, if ultimately accomplished, will be a welcome reduction in fire risk, but it certainly cannot provide assurance that campfires would not flame out of control.

4.5

In summary:

- Developing and opening campgrounds will greatly increase the risk of wildfire; it would also likely increase the damage to natural habitats
- The draft plan fails to recognize these environmental risks
- To avoid these adverse effects will require significant, sustained budgetary expenditures for after-hours staffing and supervision

Sincerely,



Response to Letter 4

Bridger Mitchell

March 10, 2004

- 4.1** The Department notes commenter's concerns that there is illegal camping, campfires, substance abuse, and vandalism occurring in the park and that commenter states that "the park service has been unable to respond to reports of these violations." The Department also notes commenter's concerns with fire danger posed by illegal campfires on public property.

Guideline OPS-1 on page 158 supports adequate funding to "ensure that operational and maintenance budgets keep pace with proposed development." A General Plan does not focus on current budgeting or staffing levels, as it is a long-range planning document that develops appropriate proposals for the continuation of resource protection and enhancement programs and for the provision of recreational facilities and opportunities for the public. These planning proposals support the purpose for the park's existence and a shared vision (established with public participation during the planning process) of what experiences the park should offer the public as well as for the protection and management of the park's natural and cultural resources. As such, the general plan serves as the basis for developing focused management plans and specific project plans as funding becomes available to implement them.

The Public Resources Code requires that a general plan be prepared prior to the development of permanent facilities. Lack of immediate funding does not preclude establishing the goals and guidelines necessary to guide potential projects or management programs at the park. Daily operations, maintenance functions, and ongoing resource management programs are directed by guidelines contained in a general plan.

A general plan's lifespan is considered indefinite. The state's budgeting levels for proposed projects fluctuates and the Department should be ready to implement development and management proposals as funding becomes available. At the time of implementation, specific projects are evaluated for consistency with the General Plan. In addition, specific development projects must comply with the California Environmental Quality Act (CEQA) by evaluating potential negative environmental impacts and proposing mitigation measures and monitoring where necessary as part of the project. The CEQA process is also a public review process in which individuals may comment on specific proposed park projects.

During the implementation phase of a specific project, the Department incorporates the staffing requirements of the proposed project in its overall request for project funding through the State Department of Finance. If the

project budget is approved, there would be adequate staffing available to operate and maintain the project after construction.

- 4.2** The Department is continuously seeking funding for appropriate levels of staffing at state parks. Funding for staff to maintain and operate a specific new project is a part of the overall funding to implement the project. Please see **Response 4.1** for a discussion of budgeting and staffing levels relative to potential facility development.

- 4.3** The concern for wildfire is shared by the Department. The General Plan addresses this concern. Please see **Response 3.14** for more information regarding this issue.

The Department will be developing specific projects recommended in the plan as funding becomes available and additional resource assessments and surveys are done. Please see **Response 4.1** for a discussion of budgeting and staffing levels relative to potential facility development.

- 4.4** Funds for staffing specific facilities or programs after the General Plan is approved will be a part of the overall budget for individual projects. Please see **Response 4.1** for more information on this topic.

- 4.5** The Department recognizes the potential for wildfire in the Inverness Ridge area as well as in other areas of the park and addresses this concern in the General Plan. Please see **Response 3.14** for more information on this topic.

MR. & MRS. ANDREW C. MCLAUGHLIN
P.O.BOX 1046
INVERNESS, CA. 94956

March 10, 2004

RECEIVED
MAR 11 2004
NORTHERN SERVICE CENTER

California State Parks
Northern Service Center,
ATTN: Bob Hare,
P.O. Box 942896
Sacramento, Ca 94296-0001

Dear Mr. Hare,

We live on North Dream Farm Road in Inverness, CA. We have reviewed the Preliminary General Plan/Draft for Tomales Bay State Park. We would like more specific information about your plans in the North Dream Farm Road area. We were unable to determine from the documents we reviewed at our local library what the impact on us would be. 5.1

Sincerely,



Carrick & Andy McLaughlin

Response to Letter 5

Carrick and Andy McLaughlin

March 10, 2004

- 5.1.** The Department thanks you for your interest in our planning proposals for Tomales Bay State Park and the North Dream Farm Road area. Please refer to **Response 3.18** for a discussion of the scope of this General Plan/EIR.

Julie C. Monson

Post Office Box 1029 Point Reyes Station CA 94956

March 8, 2004

California State Parks
Northern Service Center
Attn: Bob Hare
P.O. Box 942896
Sacramento, CA 94296-0001

RECEIVED
MAR 11 2004
NORTHERN SERVICE CENTER

Dear Mr. Hare,

I am writing about plans for ~~3~~ Tomales Bay State Park, specifically proposals for "improvements" at Hearts Desire. Our family frequently uses Hearts Desire for swimming, picnicking and hiking. It is one of our favorite Point Reyes outdoor destinations. I have the following comments:

1) Re: car camping. The object to any camping at Hearts Desire, but most particularly car camping, because of additional paved parking spaces, increased overnight use, additional toilet facilities all of which will sadly degrade the quiet, informal quality of this park. Car camping these days comes with a lot of negatives for this site. It's too small for car camping. This use belongs elsewhere.

6.1

2) Re: Kayak "put-in" facilities. No facilities are needed here for "put-in". We've kayaked many times to Hearts Desire & cheerfully pulled our kayaks up onto the sand. "Formalizing" facilities can only reduce the scenic quality of these 6 small beaches.

6.2

You seem to be attempting to implement a mandate to increase public use of this park. I have no quarrel with increased use by the public, only that it be contained + regulated to limit degradation to this barely small park area, and not add to pollution in Tomales Bay. Car camping is not the way to do this. Actually, we think any overnight camping on this site is inappropriate.

6.3

Sincerely,

Julie C. Monson

Response to Letter 6

Julie C. Monson

March 8, 2004

- 6.1** The Department acknowledges the commenter's preference for no camping in the Heart's Desire Area. Please refer to **Response 3.3** for text revisions regarding camping in the Heart's Desire Area.
- 6.2** The proposal to formalize a car-top watercraft launch area (Guideline HD-5, page 165) discusses minimal impact improvements to the area, such as creating a formalized sand "drag" path to a launching area and providing a drop-off area in the parking lot. These are not facilities that would cause significant impacts to the scenic quality of the area. Additionally, AES-4, page 155, provides a guideline for park staff to incorporate the positive aesthetic and spirit of place values of an area, such as Heart's Desire Beach, in daily management and site/ structure modification decisions, further avoiding or reducing any impacts to the scenic qualities of the area.
- 6.3** The Department acknowledges the commenter's preference for no overnight camping in the Heart's Desire Area. Please refer to **Responses 3.3 and 9.6** for further discussion of the drive-in campground proposal at the Heart's Desire Area.

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**EAC--Environmental Action Committee of West Marin
PO Box 609
Point Reyes Station, CA 94956**

Keith Demetrak, Chief
Planning Division
P.O. Box 442896
Sacramento, CA ~~95814~~ 95814 44296-0001
TEL 916-653-9377

RECEIVED
MAR 12 2004
NORTHERN SERVICE CENTE

3/8/2004

RE: Comments on Tomales Bay State Park General Plan

EAC is a West Marin environmental non-profit organization with 1000 members.
For more information on our organization please visit www.eacmarin.org.

We have reviewed the Preliminary General Plan and Draft EIR. We appreciate that the EXISTING LAND USE, FACILITIES, INTERPRETATION, AND RESOURCES section is based on extensive local knowledge, and that a lot of thought has gone into this general planning process. As an EIR we find that the document is woefully short on environmental analysis or specific technical detail. 7.1

Environmental review has been deferred for *every* item on the checklist; for instance, there has been no biological survey at all, the maps are very general in nature, and there is no commentary on cumulative impacts. For a precious asset like Tomales Bay State Park, we do think that Department of Parks and Recreation would have done the baseline biological inventory work at the forefront of this planning process.

To be specific we would offer the following comments:

A. General Guidelines and Management Plans:

P128 Line 3. Watershed management Plan. Change "Assess the impacts" to "Assess and monitor the impacts". 7.2

Add a section WIL-6 which recognizes the value of osprey habitat in the area. 7.3

B. Specific Plans for Management of Areas of the Park.

Hearts Desire Area:

There is no reasonable explanation why the existing 6-site "hike-bike campground" (which also served groups adequately) was closed. "The park closed these sites in July 2002 due to the operational constraints of this (night park closure) situation". Reopening of this campground should be considered as an alternative. We are in favor of re-opening the hike-bike camping style that was formerly available at the site. The development of car camping does not make sense given the availability of 175 private sites nearby and 61 sites at Samuel P. Taylor State Park. Given the sensitive ecosystems within Tomales Bay State Park it would make more sense to develop drive-in campgrounds elsewhere in the State Park system.

7.4

7.5

While there is a lot of talk about the "spirit of place" in the General Plan, there is no evaluation of carrying capacity, no mention of cumulative impacts from noise and generators, no specific discussion of infrastructure (buildings, campsites, use of roads, possible need for new trails) associated with the proposed new campground.

7.6

7.7

7.8

As noted in General Plan, fire in closed-cone pine forests is a serious threat (e.g. witness Salt Point State Park). Uncontrollable wildfire originating at the proposed new campground could have significant adverse impacts on biological resources at the park itself, and could also destroy hundreds of homes in the surrounding community at Shallow Beach and Inverness.

7.9

Thank you for the opportunity to comment.

Sincerely



Ann Baxter
President

Response to Letter 7

Anne Baxter, President Environmental Action Committee of West Marin
March 8, 2004

- 7.1** The General Plan serves as a first-tier Environmental Impact Report as defined in Section 15166 of the California Environmental Quality Act (CEQA) Guidelines. The analysis of broad potential environmental impacts will provide the basis for future second level environmental review, which will provide more detailed information and analysis for site-specific developments and projects. Please see **Response 3.18** for a further discussion of the focus and specificity of this general plan.

The environmental analysis presented in this Preliminary General Plan/ Draft EIR for Tomales Bay State Park is appropriate for this first-tier environmental impact report. This document presents numerous goals and guidelines, as well as potential mitigation measures, to protect and preserve the sensitive resources in the park, including vegetation, wildlife, wetlands, water quality, and soils. As discussed on page 186 in the Environmental Analysis section, potential adverse impacts and mitigation measures associated with these impacts have been identified and discussed. These impacts and mitigation measures reflect the specificity of the General Plan. As specific projects are proposed, appropriate site-specific mitigation measures will be developed.

A complete biological inventory of the park is not appropriate for this first-tier level document, which is intended to provide a vision of the future resource conditions and visitor experience and to propose broad management goals and guidelines that will direct future management of the park. The General Plan provides an understanding of significant resource values as the basis for addressing general planning issues, and establishes a framework and direction for more focused resource planning that occurs beyond the approval of the plan. Collection of more detailed resource data is appropriate and necessary in subsequent planning phases. As facilities are proposed, site-specific surveys will be completed. It is at this time, when the project scope is fully defined, that potential impacts can be analyzed and appropriate mitigation measures identified.

A discussion of cumulative impacts can be found on page 222-223 of the Environmental Analysis section of the Preliminary General Plan/ Draft EIR. The planning proposals of Marin County, the National Park Service, and other regional agencies and stakeholders were considered during formulation of the plan's recommendations and in the evaluation of cumulative impacts. Demographic trends for the state and region were also considered. Please see the General Plan's goals and guidelines for natural, cultural, aesthetic, and recreational resources for specific recommendations that limit resource impacts

from facilities proposals, as well as the Environmental Analysis for specific mitigations proposed for the plan's proposals.

- 7.2** The following paragraph discussing the Watershed Management Plan, located in the Plan Proposals section on pages 130-131, will be changed as follows:

Develop a Watershed Management Plan for the park to define current conditions, identify data gaps, and to determine where improvement measures are needed. Elements of this plan may include, but not be limited to: 1) Inventory and prioritize sediment sources, analyze the sediment transport functions in the stream systems with respect to their impact on instream habitat and on sediment delivery to Tomales Bay. Assess and monitor the impacts of park roads on water quality. 2) Determine if fluvial geomorphic analysis is needed for park streams (and if so, at what level). This analysis would provide a scientific basis for selection, design, implementation and monitoring of future fisheries habitat enhancement and sediment reduction projects. 3) Assess the impacts to ecology, the watershed, and water quality from recreation and other park activities.

- 7.3** To recognize the value of osprey habitat in the park, the following text to Guideline WIL-6, Sensitive Wildlife Guidelines, page 136, will be changed as follows:

WIL-6 Maintain and enhance northern spotted owl and osprey populations and habitat within the park by activities such as monitoring the local population, participating with other agencies in implementing recovery strategies, careful location of recreational facilities, and avoiding tree removal or trail work in spotted owl habitat or around known osprey nesting sites during their breeding season.

- 7.4** The former Hike-Bike campground was closed not only for operational budgetary problems but because it had little use by its originally-intended user groups (people who are on long-distance hikes or bicycle trips). Over the years, a relatively small number of people discovered that they could drop off their gear at the campground, park their cars at the top of the Jepson Grove Trail along Pierce Point Road, and hike back down the trail to their campsite. This site operated as neither an official "hike-in" site (such as occur at Point Reyes National Seashore) nor as an official "walk-in" site as occur at many State Parks. The General Plan does not recommend reviving this camping situation which leaves untended cars along a public road. The General Plan proposes official "walk-in" camping

opportunities to serve visitors who arrive by car, bike, or on foot at the proposed campground at the Heart's Desire Area and at Marconi Cove.

- 7.5** The Department thanks you for your comment on drive-in camping. Please refer to **Response 3.3** for text revisions pertinent to the proposed drive-in campground in the Heart's Desire Area and to **Response 3.8** regarding camping demand.
- 7.6** This general plan's proposals are based on an evaluation of existing resources documentation only (see **Responses 7.1 and 8.2** for more information on the scope of this general plan). During implementation of specific recommendations in the General Plan, assessments and surveys will further document the specific resource values in a project's proposed site, and the appropriate level of facility development will be determined for that site. The determination of carrying capacity for a particular area will also be based on impacts from facility development to natural, cultural, aesthetic, and recreational resources and visitor experiences over time. Even so, based on existing resource inventories and assessments, the Planning Team has recommended potential ranges of numbers for appropriate facilities for several areas of the park, including the number of campsites recommended for the proposed drive-in campground in the Heart's Desire Area.
- The General Plan outlines a method of establishing and adapting carrying capacity for implemented planning proposals on pages 173–179 of the General Plan (the section titled “Visitor Carrying Capacity: the Sustainability of Natural, Cultural, and Recreational Resources and Visitor Experiences”).
- 7.7** The Environmental Analysis section of the General Plan, Cumulative Impacts section, pages 222–223, discusses the potential of increased noise from plan proposals if implemented. Potential mitigations for possible increased noise are discussed in this section, including monitoring of boat noise, enforcement of park noise standards in campgrounds, the use of an adaptive management process to evaluate impacts, and the use of management actions to minimize impacts. See pages 173–179 of the General Plan (the section titled “Visitor Carrying Capacity: the Sustainability of Natural, Cultural, and Recreational Resources and Visitor Experiences”). This section outlines an Adaptive Management Process that is useful for current and future use by Department staff in reducing noise impacts in the park.
- 7.8** The General Plan is a programmatic document that does not focus on individual specific requirements of the facilities proposed in the plan. It is a visionary look at desired future conditions and recommendations for

appropriate types of facilities and programs for the park. Please see **Responses 4.1 and 7.1** for more information on this topic.

- 7.9** The Department shares the commenter's concern about potential wildfires in and around the park, and addresses this issue in the General Plan. Please see **Response 3.14** for more information on this subject.

March 12, 2004

California State Parks
Northern Service Center
Attn: Bob Hare
PO Box 942896
Sacramento, CA 94296-0001



RE: Comments Regarding the Draft Environmental Impact Report for the Preliminarily General Plan for Tomales Bay State Park

Dear Mr. Hare:

Please accept the following comments on behalf of The Ocean Conservancy and our 25,000 California members. We appreciate the opportunity to offer our input on the Draft Environmental Impact Report for the Preliminarily General Plan for Tomales Bay State Park and ask that we be placed on the notification list for this project.

The Ocean Conservancy is a non-profit conservation organization dedicated to the protection of the marine and coastal environment. Over the past several years, we have been active on a wide range of issues affecting the California coast including fisheries, marine wildlife, ocean ecosystem protection, and water quality. The Preliminary General Plan for Tomales Bay State Park (hereinafter "General Plan") and attendant Draft Environmental Impact Report (DEIR) presents an important opportunity to improve protection of Tomales Bay both for its habitat values and for future generations of Californians to use and enjoy.

We request that the DEIR be revised to address the concerns described below. Because our concerns with the document are fundamental, we urge that the DEIR be revised and re-circulated for additional public comment.

- Carrying capacity analysis, resource biological surveys, management plans, and watershed management planning must be done prior to developing plans for specific park development.
- The DEIR should be revised to include a wider range of project alternatives.
- The cumulative impacts section of the DEIR should be revised to provide more detailed analysis of both the Marin County General Plan and the Point Reyes National Seashore General Management Plan Update and discussion of the Gulf of the Farallones National Marine Sanctuary Management Plan Review process.
- The DEIR should be revised to provide more specificity with regards to potential impacts and mitigation measures.

8.1

The Ocean Conservancy strives to be the world's foremost advocate for the oceans. Through science-based advocacy, research, and public education, we inform, inspire and empower people to speak and act for the oceans.

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Park-Wide Proposals for Carrying Capacity Analysis, Biological Surveys, and Management Plans Should be Done Prior to General Plan Adoption.

The California Public Resources Code requires that attendance at state park system units be limited to the “carrying capacity” of the area. See Public Resources Code Section 5001.96. Section 5019.5 of the Code specifically requires that the carrying capacity survey be done “Before any park or recreational area developmental plan is made ...” (emphasis added). In spite of this clear requirement of law, the Tomales Bay State Park Preliminary Plan and DEIR states that the conditions that affect the “carrying capacity” of the Park have “been broadly defined by the general plan and will be further defined by processes that will take place after the plan is complete.”

8.2

The Ocean Conservancy believes that deferring more detailed carrying capacity analysis until post-general plan adoption violates both California law and common sense. The point of performing a detailed carrying capacity analysis prior to project planning is obvious – this analysis is critical to guiding both the acceptable level of human use of a park area and the appropriate infrastructure to serve this level of use. For example, without a biological survey and watershed management planning, it is not reasonable to assume that adding car camping or constructing a new boat launch will result in acceptable impacts to park resources. Instead, baseline studies must be performed first, and project planning should be guided by this baseline data.

The DEIR suggests development of a variety of additional planning tools including a comprehensive biological survey, resource management plans, watershed management plans, and wildlife management plans. The Ocean Conservancy agrees that such baseline planning documents are critical to effective planning and resource protection. Again, development of such information should come before planning specific expansions to park use and should help guide decisions about recreational area development. The Ocean Conservancy urges the California State Parks to develop this preliminary resource analysis information before adopting a new General Plan for Tomales Bay State Park.

The California Environmental Quality Act Requires Consideration of a Reasonable Range of Alternatives.

Compliance with the California Environmental Quality Act (CEQA) requires a lead agency to analyze a reasonable range of project alternatives capable of avoiding potentially significant impacts. The Ocean Conservancy urges State Parks to analyze a project alternative that does not include car camping at Heart’s Desire Beach. One of the critical factors affecting the level of impact park visitors can be expected to have on natural resources including water quality and wildlife, is the amount of time they spend in the park. Clearly, a park that is used during daylight hours will have significantly different (and lesser) impacts than one used 24 hours a day.

8.3

As noted in the DEIR, Tomales Bay supports a diverse community of year round and migratory water birds. The upland areas around the Bay also support bird, mammal, and other species including 80 special status sensitive animal species. Potential adverse impacts to birds and other wildlife associated with noise, lights, and human presence on the beach and in the park area could be greatly reduced by limiting human use to daytime

hours. Reducing human use to daytime hours would also greatly reduce the amount of wastewater generated within the park, with an attendant decrease in potential water quality impacts to the Bay. At a minimum, a project alternative that does not include car camping should be fully analyzed in the DEIR.

The DEIR's Cumulative Impacts Analysis is Inadequate.

CEQA requires that an EIR contain a reasonable analysis of the expected environmental effects of past, present, and anticipated future projects producing related cumulative impacts and an analysis of options for mitigating or avoiding significant cumulative impacts. Unfortunately, the cursory cumulative impacts analysis section provided in the Tomales Bay Park DEIR is not sufficient to assess the likely impacts of development under the Park General Plan, the Point Reyes National Seashore General Plan Update, and the Marin County General Plan. The DEIR's cumulative impacts section must be revised to provide more detailed and specific information about the type and level of impacts to be expected from these related projects. Proposed mitigation measures must also be analyzed. For example, the DEIR should include current and projected visitor numbers for the National Seashore, a discussion of new recreational opportunities proposed by the National Seashore, etc. The DEIR should focus this analysis on potential adverse impacts to the natural environment such as the effect of general increases in visitation and/or development on water quality and habitat. At a minimum, discussion of the National Seashore's planning process, which is directly relevant to the Tomales Bay Park General Plan, must be added to the DEIR. Currently, the document only makes brief mention of this planning process and provides no analysis whatsoever. The Gulf of the Farallones National Marine Sanctuary is also currently engaged in a Management Plan review process that should be addressed in the cumulative impacts analysis of the DEIR.

8.4

The DEIR Does Not Provide an Adequate Analysis of Impacts and Proposed Mitigations are Too Vague to be Assessed.

The DEIR should be revised to provide more specificity with regards to potential impacts and mitigation measures. Even in the context of a programmatic DEIR, CEQA requires a reasonable level of specificity of analysis to allow both decisionmakers and the public to assess project impacts and the likely effectiveness of proposed mitigations. The Ocean Conservancy is particularly concerned about the Preliminary General Plan's potential impacts to the water quality of Tomales Bay and the inadequacy of mitigation proposed to address these impacts.

8.5

Tomales Bay's beneficial uses as listed by the Regional Water Quality Control Board's Basin Plan include wildlife habitat, preservation of rare and endangered species, marine habitat, fish migration, fish spawning, water contact recreation (swimming, boating, etc.), non-water contact recreation (hiking, bird-watching, picnicking), commercial and sport fishing (halibut, clams, herring, rock crab, and ghost shrimp), and commercial aquaculture of shellfish. The Bay is currently listed as "impaired" due to pathogens, sediment, mercury, and nutrients.

As noted in the DEIR, several of the proposals contained in the Preliminary General Plan have the potential to adversely impact water quality and contribute to further impairment of the Bay. Specifically, camping facilities and expanded opportunities for boat access present direct threats to water quality that must be fully analyzed and mitigated. Unfortunately, the DEIR does not provide sufficient analysis to assess project impacts to Bay water quality.

8.6

TOC Comments on Tomales Bay Park DEIR
March 12, 2004
Page 4

The Ocean Conservancy is particularly concerned about the location of the Heart's Desire restroom. The leach lines for this facility are immediately adjacent to a stream, presenting an unreasonable threat to water quality. It is our understanding that water quality problems related to elevated pathogens have already been identified in this area. The proposal to dramatically increase wastewater generation at this site (via establishment of a car camping area with 24 hour use patterns) cannot be seriously considered without relocating the restroom and leach lines to ensure protection of Bay water quality. The DEIR must be revised to provide a more detailed analysis of these impacts and proposed mitigations. It is not acceptable to defer such analysis to future planning documents.

8.7

Nor have the potential water quality impacts of the proposal to add camping and a boat launch facility at Marconi Cove been adequately analyzed or mitigated in the DEIR. It is well known that boaters contribute to Bay pollution by dumping raw sewage into the Bay. In 1998, an outbreak of Norwalk-like virus was linked to human fecal contaminated oysters in Tomales Bay. Clearly, any development that could increase the likelihood of human sewage pollution in Tomales Bay must be taken very seriously and avoided if it cannot be fully mitigated. Provision of a restroom at Marconi Cove is not sufficient to mitigate water quality impacts associated with boat facilities. Provision of launch and parking facilities for boaters can reasonably be expected to increase recreational boat use of the Bay. With increased boaters comes increased risk of sewage pollution from boats. Even provision of pump out stations is unlikely to mitigate this impact, as most small boaters do not have toilet facilities on board. The DEIR must be revised to fully analyze this impact and effective mitigation measures must be included.

8.8

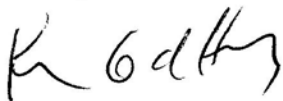
Conclusion

The Ocean Conservancy urges California State Parks to revise the Tomales Bay State Park General Plan and DEIR to address the above-mentioned concerns and to comply with state law. We also request to be provided with a copy of the revised document and placed on the notification list for this project.

8.9

Thank you for your consideration of these comments.

Sincerely,



Kaitilin Gaffney
California Central Coast Program Manager

Response to Letter 8

Kaitilin Gaffney, The Ocean Conservancy

March 12, 2004

8.1 The Department thanks you for your interest in the Preliminary General Plan/ Draft EIR for Tomales Bay State Park. Your concerns have been thoroughly considered. The responses below include appropriate General Plan text revisions addressing your comments. The Department will follow requirements outlined in the CEQA Guidelines Section 15088.5 with regard to recirculation of Draft EIRs.

8.2 During a typical general planning process, the level of existing resource information available is normally adequate for a first-tier planning process but generally insufficient for final determination of actual location and size of future park facilities and programs recommended in the plan (see **Response 7.1** for more information on tiering). The determination of carrying capacity in a given park area will be determined during the implementation phase of a specific project, and in an ongoing Adaptive Management Process as proposed on pages 173–179 of the General Plan (the section titled “Visitor Carrying Capacity: the Sustainability of Natural, Cultural, and Recreational Resources and Visitor Experiences”).

As funding becomes available for implementation of General Plan recommendations, the Department will conduct more detailed site planning, resource assessments, and surveying that are recommended in the plan and that are necessary to implement the proposals of the plan. Information from these activities will be integrated into the process for determination of specific locations and sizes of facilities based on resource conditions that can support the facilities without unacceptable resource or visitor experience impacts. As an example, the Planning Team did recommend an approximate number of campsites for the Heart’s Desire Area drive-in campground based on an initial review of the area’s size and existing natural and cultural resource information. As an illustrative example, however, the plan’s recommendation for campground size may be modified downward in the future due to information gathered during further investigations of site conditions.

8.3 The Planning Team considered proposing an alternative with no drive-in camping, but determined that providing such opportunities for overnight use at Tomales Bay State Park was an important recreational objective of the plan and should be included as an option in each alternative, given the deficit of public car-camping opportunities in West Marin. General Plan guidelines HD-7 and HD-8 consider a range of possibilities for developing car camping and/or walk-in campsites that will have the least impact on park resources.

- 8.4** The general plan team worked with other public agencies, groups, and individuals to integrate our planning with regional concerns, efforts, trends, and opportunities. The State Park general planning team met with representatives of the Tomales Bay Watershed Council, Point Reyes National Seashore, and Marin County in order to help coordinate the Tomales Bay State Park General Plan with the on-going planning work of these other organizations. Available information that was deemed pertinent to the Tomales Bay State Park General Plan was included from the update processes of the *Marin Countywide Plan* and the Point Reyes National Seashore *General Management Plan* as well as information from the Tomales Bay Watershed Council's *Tomales Bay Watershed Stewardship Plan*. The Department is committed to coordinating with regional agencies the planning and management of public recreation lands as well as for the preservation of resources. See pages 159–161 in the General Plan for goals and guidelines concerning community and interagency relations.

Guideline COM-4, Regional Planning Guidelines, page 161, will be changed as follows:

COM-4 Continue Department participation in regional planning forums such as the 2002-03 *ad hoc* “West Marin Planners Group” (consisting of planners from Marin County, National Park Service, State Parks, and the Tomales Bay Watershed Council) to coordinate recreation and land use issues. State Parks should also work with other agencies, such as The Gulf of the Farallones National Marine Sanctuary, to coordinate regional resource and recreation planning, development, and management.

- 8.5** As a program-level document, the Draft EIR does not analyze in detail the site-specific impacts of future activities at specific locations. The Draft EIR describes generally the types of impacts that may occur, and describes the standards, appropriate management practices, regulations, or decision-making processes that would be followed to avoid such impacts. The Draft EIR presents as much information as can be reasonably given at this program-level discussion.

As required by the CEQA, subsequent activities carried out pursuant to the General Plan would be reviewed to determine whether additional environmental analysis must be performed [CEQA Guidelines Section 15168(c)]. Please see **Responses 3.18 and 7.1** for a discussion of the scope of this general plan and first-tier environmental document.

- 8.6** The Environmental Analysis (see pages 183-227 of the General Plan) addresses potential environmental impacts for the recommendations in

the plan based on resource documentation available at the time of the general planning process. However, implementation of specific projects based on plan proposals will depend on further resource assessments to determine potential resource impacts. Specific development projects must also comply with the California Environmental Quality Act (CEQA) by evaluating potential negative environmental impacts and proposing mitigation measures and monitoring where necessary as part of the project. Please see **Response 8.5** for further discussion on this topic.

- 8.7** Please refer to **Response 3.1** for text revisions pertinent to this comment. The proposed drive-in campground is located over one-quarter mile (in a straight line) up a steep hill from the Heart's Desire Beach restroom; therefore this campground would not add any wastewater burden to the Heart's Desire restroom. The proposed drive-in campground will have its own restroom. The General Plan makes recommendations for possible park facilities based on an assessment of a site's ability to reasonably support those facilities. When funding for implementation of the plan's proposals becomes available, the Department will take a closer look at the site and its resources and available utilities, among other issues, and determine the appropriate design of facilities for the site.
- 8.8** State Parks already provides most restroom facilities on the west side of the bay and the new restroom facilities proposed in the General Plan for the east shore are important contributions to mitigating the problem of human waste pollution of Tomales Bay (of which boating is only one of a number of sources).

Guideline REC-4, located on page 150, will be changed as follows:

Enhance the recreational use of watercraft on Tomales Bay waters by providing safe and convenient water access facilities. The character of access accommodations (e.g., ramps, steps, gravel/sand beach, etc.) and their design shall be responsive to both the specific setting and the nature of the projected use. Consider existing uses, such as adjacent state water bottom leases for aquaculture, when evaluating watercraft access points on Tomales Bay.

A new guideline, MC-5, will be added to the General Plan on page 171 as follows:

MC-5. Design Recreational Facilities to Respect Water Quality and Shellfish Aquaculture

State Parks shall coordinate with the Department of Fish and Game and the Department of Health Services to ensure that development and operation of recreational facilities at

Marconi Cove consider potential impacts to freshwater and baywater quality, wildlife, and to existing state water bottom leases utilized for commercial shellfish aquaculture.

The Department believes that providing regulated public boat launching facilities benefits the water quality of Tomales Bay by redirecting existing unregulated boat launching to areas that can be controlled and monitored and where public education and proper sanitation disposal facilities can be provided. It is possible that recreational boating will need to be regulated by permit in the future (just as boat camping is now regulated by permit). Properly designed, the proposed boat launching facilities at Marconi Cove can be an important means of improving water quality in Tomales Bay and reducing boater impacts on wildlife through education. When funding becomes available for implementation of General Plan proposals, further site investigations, including traffic and safety assessments, and consultations with other agencies, including Caltrans, will take place. At that time it will be determined if boat trailers would be feasible at the Marconi Cove entrance.

The General Plan is also a first-tier EIR that uses existing resource documentation to recommend facility development and resource management programs for the park. It provides a vision for the park that guides future and ongoing Department actions. Please see **Response 8.6** for further discussions regarding compliance with the CEQA.

- 8.9** In accordance with the CEQA Guidelines Section 15088.5 the Department has revised the General Plan/ Draft EIR with the addition of new guidelines and amendments, included herein, that were determined to be appropriate and necessary to clarify the intent of certain plan proposals. Please also see **Response 8.1**. As requested, you will receive a copy of the Department's Response to Comments, which incorporates revisions being made to the Preliminary General Plan/ Draft EIR. This Response to Comments document (with text revisions) and the Preliminary General Plan/ Draft EIR, constitutes the Final EIR.



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March 12, 2004

Tomales Bay State Park

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**Re: Tomales Bay State Park
General Plan and Draft EIR**

Dear Bob:

Nearly seventy years ago, the Opening of the Golden Gate Bridge prompted not only real estate developers to begin purchasing valuable beach front property, but stimulated a small group of women to act in order to protect these same resources by putting them under public stewardship. As you know, they formed the Marin Conservation League. Through foresight, wisdom and leadership, Carolyn Livermore, the recognized leader of this group, began the process that MCL maintains to this day -- the preservation and protection of Marin's outstanding, and irreplaceable, natural resources. One of MCL's first memorable efforts, led by Livermore in the late '30's was to provide funds and get the County Board of Supervisors to match the amount and then purchase, Shell Beach -- the beginning of Tomales Bay State Park.

It is with pride and a sense of responsibility that we enclose our comments and recommendations regarding the General Plan and Draft EIR. Note that MCL has not changed its mission, goals or objectives regarding the protection and preservation of Marin's unique natural resources. Unfortunately, we cannot say the same for the proposed Tomales Bay State Park General Plan and Draft EIR.

MCL is concerned that the Plan moves significantly away from the Resource Code 5019.53 directive which specifically states that protection of natural and cultural resources is a priority and that any changes must be consistent with that goal. Major recreational development such as proposals for car camping and mountain biking do not conform to the Resource Code but instead become attractions unto themselves and harm "... natural, scenic, cultural, and ecological values of the resource", that the Code protects.

This proposal is a major undertaking. We are concerned that the public document from the section heading "Environmental Analysis" to the end of the document was unavailable on the web. Without this information we are unable to provide comments to avoid or mitigate potential significant environmental effects within the proposal. We suggest that you post this information and extend the deadline to accommodate comments for this part of the proposal.

Thank you for the opportunity to comment and make recommendations on the Tomales Bay State Park General Plan and Draft EIR.

Sincerely,

Jana Haehl
President

9.1

9.2

TOMALES BAY STATE PARK GENERAL PLAN
DRAFT ENVIRONMENTAL IMPACT REPORT

COMMENTS AND RECOMMENDATIONS
BY THE
MARIN CONSERVATION LEAGUE

INTRODUCTION

The proposed Tomales Bay State Park General Plan/Draft EIR violates the mandate that this park, and any other park in California, be managed for the protection of natural resources. The Plan encourages increased visitor use beyond historic levels with a call to provide the public with high use and high cost activities that neither the Resource Code, the parks landscape, nor the current state of the State Park Department's budget or personnel can sustain.

9.3

The proposed Plan contains fashionable verbiage such as "adaptive management process" (page 173), or "connectivity" (page 8) that serve as a verbal smoke screen. The Plan should eliminate jargon that could be misleading or manipulated. The public deserves clear, direct language in visionary statements, of what is proposed and the reason it is being proposed.

9.3.1

Even if the proposed Plan was acceptable it is important to note that the State Parks Department as a whole and Tomales Bay State Park, specifically, does not have the budget or personnel to implement it in any acceptable time frame. The Plan cannot be executed as a whole. Selective implementation of the various proposals can and will result in the park violating its pledge to protect the natural resources. For example, if drive-in camping is allowed but no mitigation of increased traffic is possible due to budgetary constraints, or if boat launching at Marconi Cove is allowed but no cleanup of the onsite contamination is performed, then the selective implementation fails to protect the Park.

9.4

Aside from the critical issue that the Plan does not reflect the requirements of the Resource code we do not have the luxury, in today's world, of proposing a plan that appears to be an unrealistic dream with an excess of "taming the west" vision combined with empty pockets. The proposed Plan, at best, could not be implemented for ten to fifteen years. And fifteen years from now the residents of Marin will not remember the process and will resent what appears to be a plan implemented without their approval. A basic question becomes -- If the Proposed Plan is approved now but not implemented for fifteen years will it still be a good plan? Our review concludes that the answer is, "No".

9.5

HEART'S DESIRE AREA

1. The Plan proposes converting an outdoor storage area to a 15 site drive-in campground, an unknown number of walk in's, plus a "campground host site" (for staff?). The introduction of more camping facilities to the park would lead to increased visitation numbers. This has the potential of seriously affecting the nesting northern spotted owls in the area. The owls have nested erratically over the past few years, and may already be affected by various park activities compared to more remote nearby nesting sites. Introduction of camping sites would require extensive clearing to reduce wildfire hazards and this would further reduce owl habitat for nesting and foraging. Dusky-footed woodrat nests could be affected by removal or habitat alteration and woodrats are the primary food item of spotted owls in Marin County.

9.6

In addition, camping and developed areas are well known for attracting corvid birds such as ravens. These birds prey on the eggs and chicks of spotted owls and other nesting birds. Expanding camping will likely increase the occurrence of ravens.

9.6

Osprey nest in many places around Tomales Bay but do not nest at Heart's Desire cove. Adding camping areas will further discourage osprey from nesting in the area.

2. Adding drive-in camping sites will increase the danger of wildfire in the area. The bishop pine forest is highly vulnerable to wildfires because the wood is volatile. A wildfire occurred in June 2003 and fire fighters noted that it was extinguished quickly only because it was early in the summer. The Vision wildfire was started by a campfire improperly extinguished and burned over 12,000 acres including 40 homes. If drive-in campsites are added, the park would have to clear large areas around the sites to reduce wildfire danger, which would increase the foot print of the development substantially and eliminate plant and wildlife habitat.

9.7

3. The drive-in camping facilities could further degrade water quality of the Heart's Desire area. Adequate septic facilities would need to be upgraded. The existing facility does not appear to be able to support the current level of public use and is situated close to shore. No water quality monitoring data for the Heart's Desire area are presented in this plan.

9.8

4. Adding drive-in camping sites will reduce the experience of the hike-in campers. This is not a "light touch for a sensitive area".

9.9

5. The Park recently shut down the hike-in campground because they lacked funds to maintain and enforce the camping. There is no assurance that the State is in any better financial position now to maintain and enforce activities at Heart's Desire beach.

9.10

6. What will the Park do to mitigate the effect of increased traffic through the village of Inverness caused by these new and expanded activities? It is unlikely that drive-in campers will remain on site during the evening. They will drive back through Inverness to find restaurants, gas, laundry facilities, and groceries among other things.

9.11

**PARK RECOMMENDED MANAGEMENT ACTIONS FOR HEART'S DESIRE
PROPOSED FACILITY CHANGES:**

1. Redesigning the picnic area should take into account where nesting and roosting spotted owls occur. Additionally, placement of picnic areas should avoid dusky-footed woodrat nests and nests should be preserved since woodrats are the primary food item of spotted owls in Marin County.

9.12

2. Regarding trail connections from Hearts Desire area to Point Reyes National Seashore. Although providing linkages with other protected areas in Point Reyes may be an important consideration it may be outweighed by the incalculable negative impact currently being experienced in many parks by bike riders who use and create trails illegally. A serious problem. The park should exercise extreme caution in the placement and/or linkage of new trails and anticipate how the trails will be used as well as the potential for additional illegal use. Currently, many bicyclists illegally use the trails at Hearts Desire with little discouragement and no enforcement because there are few rangers at the Hearts Desire area. Multi-use trails at Heart's Desire is not appropriate because of the sensitivity of the area.

9.13

MCL supports the Park's following proposed management actions.

1. Restore the natural outlet of the estuary. Restoration of estuaries along Tomales Bay would contribute to the overall restoration efforts of Tomales Bay.
2. Restore regeneration of Jepson Grove bishop pines. This effort is important because the grove and surrounding forest is senescent and the trees are dying back.
3. Maintain Area beaches for Indian, Shell and Pebble as "walk in" only. This will ensure that resource values are preserved and limit human impact.
4. We support the preservation and protection of archeological sites.

ADDITIONAL RECOMMENDATIONS OF MCL

Maintain a "light touch" in all areas.

1. Do not add drive-in camping facilities at Hearts Desire. These facilities would disturb native nesting species such as spotted owls, attract nuisance predators such as ravens, elevate noise levels, affect water quality, introduce light sources which would reduce natural darkness in the area, and increase wildfire danger. A drive-in campsite would seriously decrease the "light touch" the park is using to guide design and management. **9.14**
2. Reopen hike-in camping. This was closed because of a shortage of personnel. Use funds to sustain this camping experience which is very popular with the public and follows the model of "a light touch." **9.15**
3. Initiate a program to inventory, remove and reduce the risk of the introduction of exotic plant species by requiring kayak groups and individuals to treat boats before they are introduced into the bay. Non-native cord-grass, for example, is thought to be spread, in part, by small recreational boats. Currently, the Park does not know the locations of non-native species, nor does it have a program for early warning. **9.16**
4. Initiate a program to remove exotic animal species such as the newly introduced non-native turkey. Turkeys are new to the Park areas only in the past couple of years and removal is imperative before the species are established and begins to affect local native species. **9.17**
5. The Plan does not include any map with water sources. All riparian and wetland areas require elevated protection because of associated sensitive plant and animal species. **9.18**
6. The Park should conduct an inventory for rare species since this has not been done for several species such as Tidewater Goby, the Tomales Roach or Point Reyes Mountain Beaver. **9.19**
7. The "Heart's Desire Area Management Vision" HD-2 guideline of "Maintaining minimally developed " walk-in" beach opportunities is not accurate since the Plan proposes adding 15 drive-in campsites which is not a minimal introduction but a major, inappropriate, change to this sensitive area. **9.20**

8. Trail use of Hearts Desire should remain hiking trails. Multi-use trails at Heart's Desire are not appropriate due to the sensitivity of the area.

9.21

NOTE: Many of our concerns, about changes that are listed in the above Heart's Desire Area that impact plants and wildlife, are applicable to the following four areas.

INVERNESS AREA

1. The North Dream Farm picnic site, plus public restroom facilities requires a Nature Conservancy easement to make a trail connection feasible (which is the rationale for the site). Are the land exchanges proposed in this area with other public agencies or with private owners? Who supervises this? We would need more information (maps and descriptions) to comment on a day-use trailhead, nature trail loop and extension of a nature trail to connect with ridge top trails of the Pt. Reyes National Seashore. Our concern continues to be impact on natural resources that are not and cannot be protected by the proposed Plan.

9.22

2. We support the removal of obsolete trailers.

3. With the exception of the comments on the North Dream Farm property we support leaving the three Inverness parcel undeveloped and managing them as natural watershed, view shed, and wildlife habitat.

MILLERTON AREA

1. Bicycle access to the Millerton Uplands Area is incompatible with preservation of this relatively small park area. This type of bike trail would only be used by people who drive to the site to use their bike. It is not a facility people would bike to and would therefore become a stand alone bike track. It would be far better to improve signage and mark shoulders as appropriate along Highway 1 through the Park so this roadway could be more safely used by bicyclists. This is an additional example of the Plan, inappropriately, making recreational usage a priority over protection of the natural resource.

9.23

MARCONI COVE

We agree that this new addition to the Park system has excellent bay access, broad natural vistas of the bay at the edge of a spectacular marine bay formed by an active earthquake fault. Because of this we recommend that any changes to this area protect these values as a priority. Although this area has already been degraded, rather than emphasize recreational opportunities, we favor restoring the area and protecting the existing natural amenities.

9.24

1. Provide limited vehicle parking for picnicking for day use travelers.

2. Provide limited camping for bike campers only. Include limited restroom facilities shared with day use travelers.

3. Do not develop this as a destination vehicle site for mountain bikers.

4. Do not use this area for kayak rentals and snacks, boat trailer parking, a boat launching ramp or a windsurfing and cartop watercraft launching area.
5. The old gas station should be demolished and the bathhouse “restored” and considered for a small orientation-interpretive display.
6. We support retaining and protecting the south end for its natural values.

9.24

NORTH MARSHALL AREA

1. We agree that given the current constraints the property should be “managed primarily to preserve its natural habitat, watershed, and open space recreation values such as scenic driving along Highway 1, hiking, and nature observation.”
2. We would need additional information that includes environmental impacts before we could support any future consideration of using this property as a connecting segment for a trail.

9.25

Response to Letter 9

Jana Haehl, Marin Conservation League

March 12, 2004

- 9.1** Public Resources Code 5019.53 also states that “Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, and cultural values....” The Plan Proposals section of the General Plan contains numerous goals and guidelines that reinforce the Department’s priority to enhance and protect the park’s resources. Goals and guidelines discussed in the plan include the preparation of a various resource management plans, such as watershed and vegetation management plans, (pp. 130,133), wildlife management assessments and surveys (p. 138), and cultural resources assessments and management plans (p. 140); evaluation of known or potential habitats for sensitive, rare, threatened or endangered species (p. 135-136); the preservation and protection of sensitive native plants and plant communities (pp. 131-132); the protection of sensitive wildlife species and their habitats (pp. 135-136); the development of a long-term program of control and/ or eradication measures to prevent the establishment and spread of non-native species (pp. 132, 138); the protection, stabilization, preservation and interpretation of the park’s cultural resources (p. 139); and providing recreational facilities that will satisfy user needs and resource protection requirements by using sustainable design for park facilities (pp. 157-158).

Recreational facilities such as campgrounds and bicycling trails within the park do not constitute “attractions in themselves” if these facilities are recommended for the explicit purpose of allowing the public to enjoy and learn about the park’s natural, cultural and aesthetic resources (while at the same time the Department is protecting sensitive resources). If State Parks did not provide opportunities for the public to enjoy these resources, it would not be fulfilling its mission, part of which is creating the appreciation for these resources that is necessary to sustain support for their continued existence as part of a state park.

The recommendations contained in the General Plan for additional camping and bicycling opportunities in the park are not in conflict with the Public Resources Code in that the goals and guidelines presented in the plan for development of those facilities include the intent that those facilities be compatible with resource management goals for the park (pp. 149, 150).

The Recreational Activities, Facilities, and Visitor Experience Goal, located on page 150, will be changed as follows:

Provide a variety of recreational opportunities that will allow California's diverse population to enjoy themselves and to refresh themselves physically and spiritually in a healthful outdoor recreation setting. New facilities development will strive to minimize negative impacts on the park's natural, cultural, and aesthetic resources.

- 9.2** Bob Hare, General Plan Project Manager, addressed this concern by e-mail on March 12, 2004 to Jana Haehl with the following response: "I noticed your comment in the [comments] cover letter that you've had difficulty accessing the Environmental Analysis or EIR on DPR's website. The EIR has been posted there for the complete 45-day CEQA review period as item #3- Environmental Analysis.pdf. I just checked it and opened it and it is indeed posted there and complete. Copies of the plan are available in a number of locations in Marin County if you want to see a hard copy. I'm attaching a notice that gives addresses of these locations."
- 9.3** Please see **Response 9.1** for a discussion of the General Plan's text concerning the Department's commitment to preserving natural resources at the park. After the General Plan is approved, the Department will be prepared to develop the facilities recommended in the General Plan when funding becomes available to implement them. Please see **Response 4.1** for additional discussion regarding funding.
- 9.3.1** Regarding your concern about the use of "fashionable verbiage" such as "adaptive management process", the Adaptive Management Process is not just a vague term but represents a specific management approach to monitoring and preserving natural and recreational resources. Please refer to pages 176-181 in the General Plan for a detailed description of the Adaptive Management Process. Please refer to **Response 3.18** for more information on how the General Plan is a first-tier CEQA document that is designed to be conceptual a broad in its scope.
- 9.4** The Department is committed to preserving and enhancing natural resources at the park. For a discussion of the General Plan's text concerning the Department's commitment to preserving natural resources at the park, please see **Response 9.1**.

At the time of implementation, specific projects are evaluated for consistency with the General Plan. In addition, specific development projects must also comply with the California Environmental Quality Act (CEQA) by evaluating potential negative environmental impacts and proposing mitigation measures and monitoring where necessary as part of the project.

- 9.5** The General Plan is a long-range document, as the commenter has noted, with an indefinite lifespan. The state's budgeting levels for proposed projects fluctuates and the Department should be ready to implement development and management proposals as funding becomes available. At the time of implementation of plan proposals, specific projects are evaluated for consistency with the General Plan. The plan is also written to allow flexibility in satisfying recreational and resource management needs within an overall vision for the park, and achieving desired visitor experiences and resource conditions.
- 9.6** The proposed site for the drive-in campground was chosen, in part, because it is already cleared and impacted land. Currently, no substantial clearing of brush would be necessary to develop the campground or to reduce wildfire hazard. Being open land this site is not prime habitat for either the spotted owl or the dusky-footed woodrat. Neither development nor operation of this campground is likely to directly impact the spotted owl or its prey, the dusky-footed woodrat. Future project-level planning and subsequent tiered CEQA documents will determine the actual scope, design, and any required mitigation measures and monitoring constraints of this campground development. Please refer to **Response 3.3** for text revisions pertinent to camping in the Heart's Desire Area. Please refer to **Response 7.3** for text revisions pertinent to osprey habitat in the park.

The possible impact of camping on corvid numbers, and their possible impact on spotted owl nestling survival will be evaluated in subsequent environmental assessments for specific projects. Guideline WIL-2 on page 134 states: "Reduce and, where possible, eliminate wildlife access to human food and garbage by using wildlife-proof trash containers throughout the park, including administration and residence areas. Educate the public about the detrimental effects of feeding wildlife and releasing animals in the park."

The long history of camping in the former "Hike-Bike" campground near Heart's Desire Beach, which is a more forested site than the proposed drive-in campground site, has had no apparent negative impact on spotted owl breeding. Osprey have successfully nested recently just below the current active maintenance area (not the proposed drive-in campground location). The maintenance activities at the active maintenance area have not apparently caused a problem with osprey nesting. The proposed drive-in campground site is over one-quarter mile (as the osprey flies) from Heart's Desire Beach and is unlikely to have any negative impact on the birdlife of the beach area. Subsequent environmental assessments for specific projects will evaluate any possible impacts on osprey nesting and other sensitive species of concern. Please refer to **Response 7.3** for text revisions to Guideline WIL-6 related to spotted owl and osprey habitat in the park.

- 9.7** The Department is always concerned about the potential for wildfires in state parks. Please refer to **Response 3.14** and **Response 9.6** for further discussions of wildfire and the proposed Heart's Desire Area drive-in campground.
- 9.8** The drive-in campground site is not located near Heart's Desire Beach. Its actual location is uphill one-quarter mile inland near the entrance station. The drive-in campground will have its own restroom facilities. A well-designed and operated septic system for the drive-in campground site would not contribute to the wastewater load of the current Heart's Desire Beach restroom and would not impact water quality of Tomales Bay.

Please refer to **Response 3.18** for an explanation of the scope of this general plan and why detailed water monitoring data is not included in the General Plan.

- 9.9** Currently there are no hike-in campgrounds in the park. Walk-in camping is part of the General Plan's proposals for all three of the plan's camping proposals. Please refer to **Response 3.3** for text revisions to Guideline HD-8 related to the drive-in campground proposal.
- 9.10** The Department thanks you for your comment on park funding. Please refer to **Response 4.1** for additional discussion regarding park funding.
- 9.11** The Department will take necessary precautions to minimize potential negative impacts of any traffic increases caused by implementing any of the plan's proposals in the communities around the park. The General Plan, in its Parkwide Goals and Guidelines for Recreation Activities and Facilities and Visitor Experience, Services, and Safety section (p. 146), recommends specific guidelines for encouraging alternate modes of transportation to access and circulate throughout the park. The plan recommends encouraging bicycle, public transit, and other types of transportation alternatives to access the park to help reduce traffic impacts in the region from future park improvements. See Guidelines ACC-3, ACC-4, and ACC-5 on page 147.

The General Plan's Environmental Analysis section, (see pages 226 – 227), has found that implementation of the proposals of the General Plan would not create significant adverse impacts to traffic, transportation or circulation in the region. Please see the Environmental Analysis, Effects Found Not to be Significant, page 226, Transportation and Traffic section, for a discussion of potential increases in traffic on Highway 1 and Sir Francis Drake Blvd. due to plan proposals. In addition, the text discusses the intention of the Department to monitor traffic impacts in the region after

implementation of any plan proposals and to use an adaptive management process to minimize those impacts if appropriate (see the “Visitor Carrying Capacity...” section beginning on page 173 of the plan for a discussion on determining acceptable visitor use levels and the Adaptive Management Process).

- 9.12 Any future specific projects, including redesign of the picnic areas in the Heart’s Desire Area, are subject to further environmental assessment of potential impacts to natural and cultural resources in the specific project area. Please see **Response 7.1** for more information on this subject.
- 9.13 The General Plan does not propose any multi-use trails for any area of the park other than consideration of permitting biking on the proposed Millerton Uplands Trail on the east shore. The Department will consider the possible impacts of illegal bike use when evaluating potential trail connections between State Park lands and National Seashore lands.
- 9.14 Please refer to **Response 9.6** for further discussion of the camping proposal in the Heart’s Desire Area.
- 9.15 Please refer to **Response 7.4** for further discussion of the former “Hike-Bike” campground.
- 9.16 State Parks is very aware of the potential serious impacts from the spread of invasive exotic plants, including the potential impact to sensitive species and habitats (including the waters of Tomales Bay). Page 132 of the Plan Proposals section discusses a goal to “eradicate or control invasive exotic plant species” and follows with guidelines to accomplish this goal. The guidelines include prioritizing eradication efforts toward those invasive plants that are negatively affecting sensitive plants and sensitive plant communities, focusing on the most invasive and rapidly spreading exotic plant species (such as cordgrass), and coordinating control and eradication efforts with adjacent landowners, when appropriate. The plan also proposes the preparation of a Vegetation Management Plan that will guide managers in the restoration of native communities and control of invasive exotic vegetation. In addition, Appendix I, Non-native Plant Species Known to Occur within Tomales Bay State Park lists non-native species occurring in the park and indicates those that are most invasive according to the California Invasive Plant Council (Cal-IPC) definitions.
- 9.17 State Parks also recognizes the potential serious impacts from the spread of invasive exotic animals, including habitat destruction and out competing native species. The General Plan has included a goal to monitor and control exotic animals and restore damaged habitats (especially if habitat recovery will not occur naturally). This goal will be achieved through coordination with adjacent property owners and government agencies,

and through the development of a Wildlife Management Plan. The Wildlife Management Plan will contain specific assessments, surveys, guidelines and procedures for exotic animal control and management.

- 9.18** The Department agrees that riparian and wetland areas require special protection. Maps 7A and 7B of the General Plan clearly delineate “streams” and “coastal zones” as “Areas of Natural Resource Sensitivity”. Guideline WIL-8 on page 136 states: “Protect and enhance, riparian and wetland habitats, establish an appropriate set back on any development adjacent to these habitats, and work to re-establish natural hydrologic flows.”
- 9.19** State Parks is committed to the preservation and protection of sensitive natural resources. Numerous goals and guidelines in the General Plan outline a variety of ways to enhance, preserve and protect sensitive wildlife and habitats. The General Plan’s Sensitive Wildlife Guidelines on page 136 (WIL-6 through WIL-13) help define the Department’s commitment to protect and preserve sensitive species and their habitats in Tomales Bay State Park. Bulleted items under “Wildlife Management Studies and Surveys” on pages 138 and 139 of the General Plan support the Department’s commitment to gather data and cooperate in inter-agency data collection on sensitive species.
- 9.20** The Heart’s Desire Area Guideline HD-2, Maintain Minimally-Developed “Walk-in” Beach Opportunities, is accurate. The walk-in beaches - Indian Beach, Shell Beach, and Pebble Beach - will remain as walk-in beaches, with minimal development. The proposed campsite development in the Heart’s Desire Area (in an existing maintenance storage area) is not near these beaches and will not change the visitor experience or management of these beach areas.
- 9.21** Please refer to **Response 9.13** for a discussion of trails in the park. The Department notes commenter’s statement that “many” of the MCL’s concerns about the Heart’s Desire area proposals are “applicable” to the other park areas. The Department cannot respond specifically to this general statement, not knowing which specific concerns the commenter has in mind.
- 9.22** The possible “land exchanges” noted in Guideline INV-4, Create Trail Opportunities at the North Dream Farm Property, on page 167, refer to any easements “(or perhaps a land exchange or transfer)” with The Nature Conservancy, an adjacent land owner, to facilitate a trail extension to connect with the ridge top trails of the Point Reyes National Seashore. As discussed on page 148, the Roads and Trails Management Plan would evaluate trail issues in greater detail, including avoiding or reducing

impacts to natural resources. Please see **Response 3.18** for further discussion of the scope of this general plan.

- 9.23** With proper design, signage, and enforcement the proposed Millerton Uplands Trail could support multiple use for hikers and bicyclists without unmitigable damage to the environment or to visitor experience in this area. However, before such a trail is designed and constructed, more detailed environmental assessment will be done to validate or invalidate this contention. If it is found that bicycling would have negative environmental and recreational impacts that could not be mitigated, then the trail would be designed and operated only for hikers. A multiple use trail is not an “attraction unto itself” for bicyclists nor for hikers. A trail is a low-impact means of opening up appropriate park areas for visitor experience using appropriate means. Both hikers and bikers commonly drive to a trailhead in order to enjoy traveling on a park trail.

Caltrans is responsible for bicycle signage and use of Highway 1 shoulder areas.

- 9.24** The Department appreciates hearing your preferences for development and use of the Marconi Cove Area.
- 9.25** Please refer to **Response 3.18** regarding the scope of this General Plan.

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**LETTER
#10**

From: "Rick Johnson" <rwjo@pacbell.net>
To: <kdeme@parks.ca.gov>
Date: 3/12/04 4:52PM
Subject: Comments on Tomales Bay State Park General Plan

Keith Demetrak, Chief Planning Division

P.O. Box Sacramento, CA 95814

916-653-9377

RECEIVED

MAR 12 2004

NORTHERN SERVICE CENTER

RE: Comments on Tomales Bay State Park General Plan

I am writing to express concerns about the Tomales Bay State Park General Plan. Of the alternatives presented, I prefer Alternative 3, and I encourage the state to pursue the alternative with minimum impact on sensitive habitat.

10.1

I believe the drive in campground and other developments proposed for Heart's Desire area are incompatible with protecting its habitat and wildlife. Similarly, adding a new launch ramp on Tomales Bay seems inconsistent with the broader regional goal to clean up the waters of Tomales Bay, and threatens the important habitat and wildlife using Marconi Cove.

10.2

10.3

Sincerely,

Rick Johnson

P.O. Box 981

Inverness, CA 94937

Response to Letter 10

Rick Johnson

March 12, 2004

- 10.1** Thank you for your comments and your concern about the future of Tomales Bay State Park. The preferred alternative (contained in the Plan Proposals section) was developed with input from the public, other agencies, Department policies and staff recommendations, which form the backbone of the plan and its proposals. The plan includes many goals and guidelines that define acceptable levels of impacts from its proposals on sensitive park resources. In addition, the plan proposes the use of an Adaptive Management Process to establish desirable resource and visitor experience conditions in the park and to adjust management actions in response to impacts to these conditions over time. Please see the Plan Proposals section of the General Plan for more information on these issues.
- 10.2** The Department appreciates hearing your preferences for the Heart's Desire Area. Please refer to **Response 3.3** for a further discussion of the drive-in campground proposal for the Heart's Desire Area and text revisions of Guideline HD-8.
- 10.3** The Department appreciates hearing your preferences for the Marconi Cove Area. Please refer to **Response 3.10** and **Response 8.8.** for further discussion and text revisions regarding protection of Tomales Bay.

March 12, 2004

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To: Bob Hare, CA State Parks
Fr: Jennifer Chapman, W. Marin Resident and federal employee
Re: Comments on Tomales Bay State Park General Plan

MAR 15 2004

NORTHERN SERVICE CENTER

I attended the meeting at the Dance Palace which clearly focused on recreation development concepts.

My main interest is in the small section of the plan on Vegetation and Fire Management and the lack of wildfire mentioned as a potential impact.

We know that in Marin County, almost 100% of all wildfires are human-caused. Increased public use of Tomales Bay State Park increases the ignition potential from primarily automobiles and campfires, but possibly also from boat fuel and other mechanized equipment. The Vision Fire was a result of unmonitored public use in Tomales Bay State Park. There is a real issue and potential impact of increased visitor use without an increased fire management and fire prevention program. Even at the current level of use, more fire management and prevention is needed. Vegetation treatment, defensible space compliance for structures, and fire education for park visitors and neighbors all need to be part of the program and future of TBSP.

11.1

Fire danger rating signage with an explanation of its meaning, and prevention information with all camping permits are minimum actions that should be taken. At the same time, it is important not to promote the idea that fire is without any positive effects. However, it is only in prescribed fire situations that it can be present in this landscape. The native American use of fire on the California coast which includes the Miwok, might be incorporated into the interpretive programming. The less frequent historic occurrence of lighting ignited natural fire, and an understanding how and why lightning occurs in this ecosystem, might also be included in the education program.

I was glad to hear that Bishop pine regeneration was a management objective, and will be interested in the alternatives to prescribed fire that are being developed.

My work with the national park service is in the areas of fire education, prevention, and information. This letter is not official correspondence, but my personal opinion, which is however, informed by the work I do. I will send you some of our fire education materials.

TBSP is a wonderful place, and I appreciate the opportunity to be involved in your public process.

Regards,



Jennifer Chapman
PO Box 186
Olema CA 94950-0186

Response to Letter 11

Jennifer Chapman

March 12, 2004

- 11.1** The General Plan addresses wildfire concerns in the Plan Proposal and Environmental Analysis sections and proposes several mitigations and strategies to reduce the potential for wildfire in the park. Please see **Response 3.14** for more information on this issue.

May 12, 2004

RECEIVED**MAR 15 2004****NORTHERN SERVICE CENTER**

Bob Hare
California State Parks-Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

Re: Marconi Cove Section of Tomales Bay State Park General Plan/Draft
Environmental Impact Report

Dear Mr. Hare:

As neighbors in Marshall, we would like to submit the following comments regarding the above plan and environmental report:

First of all, we are delighted that the State has purchased this wonderful piece of property so that it can be used by the public. We are intimately familiar with it and emphasize that it is a small sliver of waterfront property. Therefore when we read the proposed plans, they seem far out of scale with the size of the parcel and the various conditions. The plan, if not significantly downsized, seems misguided at best.

12.1

Although a small parking lot, interpretative kiosks and perhaps a place for kayakers to put in would be appropriate and would allow the public to observe the harbor seals which are present in Marconi Cove and the vast amount of bird life, we are concerned about those uses when combined with the other plans. It is hard to imagine that the small site could also accomodate a larger parking lot for boats and trailers, campsites, and housing for a campground host.

There are also several other factors to consider. These include the following:

1. Probable inability to find potable water and adequate septic fields on the parcel; **12.2**
2. The access to the property is just downhill from a dangerous curve going north on Highway One. It is difficult enough to access Highway One in a car. Having boat trailers moving in and out of Marconi Cove would present a dangerous condition to which CalTrans and other experts would need to evaluate (in fact, a CalTrans dumptruck crashed on that very downhill some months ago); and **12.3**
3. Every winter some 90% of the parcel is covered with water. **12.4**

It is also important to note that the parcel appears to be a sensitive habitat; it has a creek flowing through it for which a permanent bridge would need to be built, and the stability of the land fill would need to be evaluated. Part of the land appears to be turning into an island.

12.5

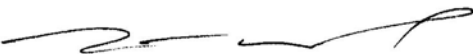
We also wonder whether Miller Park to the north, which is already developed with a boat ramp, pier and paved parking, is so overused that Marconi Cove needs to be developed as well for motorized boating.

12.6

Again, we are pleased that the land will be available to the public. Our concern is simply that the proposed scale of the development is not supported by the size or conditions of the parcel.

Finally, please add us to your mail contact list for future information regarding the Tomales Bay State Park.

Thank you.



Scott N. Kivel
Lia L. Lund
18400 State Route One
Marshall, CA 94940

Response to Letter 12

Scott Kivel

March 12, 2004

- 12.1** Thank you for your comments regarding the potential development of the Marconi Cove property. After approval of the General Plan and in the event of funding for development of the plan proposals, the Department will conduct further site investigations and assess the site for specific development, including the appropriate sizes and locations of facilities. Future assessment will help determine the specific mix and scale of recreational uses for this property.
- 12.2** The General Plan makes recommendations for possible park facilities based on an assessment of a site's ability to reasonably support those facilities. When funding for implementation of the plan's proposals becomes available, the Department will take a closer look at the site, its resources, and available utilities, among other issues, and determine required infrastructure and feasibility of facilities for the site.
- 12.3** When funding becomes available for implementation of General Plan proposals, further site investigations, including traffic and safety assessments, and consultations with other agencies, including Caltrans, will take place. At that time it will be determined if boat trailers would be feasible at the Marconi Cove entrance.
- 12.4** When funding becomes available for implementation of General Plan proposals, further evaluation of the Marconi Cove site will occur to properly drain surface water for construction of facilities and public use.
- 12.5** When funding becomes available for site development, evaluation of sensitive resources will take place, and impacts to those resources minimized, as appropriate. Specific development projects must comply with the California Environmental Quality Act (CEQA) by evaluating potential negative environmental impacts and proposing mitigation measures, which, when approved, must be implemented as part of the project.
- 12.6** The Miller County Park north of Inverness may be adequate to meet current trailered boat-launching needs for the northeast corner of Tomales Bay. However, conditions at Miller County Park (such as siltation, user demand, or County funding) may change in the future. The General Plan looks at long-term possibilities and is proposing boat-launching at Marconi Cove so that such an option might be considered in the future. After approval of the General Plan and when funding becomes available, site

evaluation and an assessment of the current needs for regional recreation will determine the specific mix and design of facilities for Marconi Cove.

March 13, 2004

California State Parks
Northern Service Sector
Attn: Bob Hare
PO Box 942896
Sacramento, CA 94296-0001

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MAR 15 2004

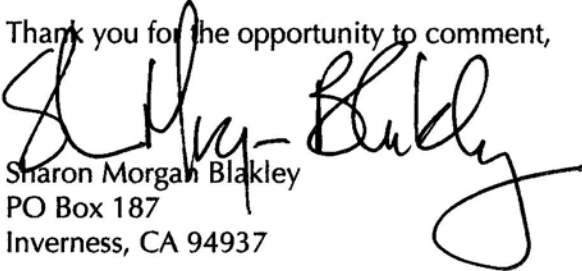
NORTHERN SERVICE CENTER

Dear Mr. Hare,

I attended your presentation of the Preliminary General Plan for Tomales Bay State Park on February 24, 2004 and my comments and concerns are as follows:

1. The Preliminary Plan does not include an evaluation of the projects or project elements to the mandated criteria. **13.1**
2. The Preliminary Plan does not include a needs assessment or evaluation. Without this information it is unclear just how the Plan was conceived, as most of the proposed changes appear to increase recreation and development and decrease resource protection. **13.2**
3. The Preliminary Plan does not include any information on the manpower resources or budget required to staff the proposed changes. This information should be included as increased monitoring by Park staff is cited as the mitigation measure that will reduce adverse impacts caused by the proposed increase in use. **13.3**
4. Although the Preliminary Plan includes a detailed description of existing properties and facilities, it does not include any identification, discussion, or recommended actions regarding adverse environmental conditions presently found within the Park. Current water quality monitoring and testing indicates high levels of fecal coliform off Heart's Desire Beach. The Plan should not only address this pollution and source but also evaluate any improvements or changes in use to existing facilities in light of this contamination. The identification, extent, and remediation of existing contamination in the Marconi Cove area should also be documented in the Plan. Any existing adverse environmental conditions should be taken into consideration when uses and capacities for these sites are developed. **13.4**

Thank you for the opportunity to comment,


Sharon Morgan Blakley
PO Box 187
Inverness, CA 94937

Response to Letter 13

Sharon Morgan Blakley

March 12, 2004

- 13.1** The General Plan contains a complete evaluation of its planning proposals in the Environmental Analysis section beginning on page 185.
- 13.2** The General Plan includes discussion about the existing recreational opportunities in West Marin County (pp. 109 – 112), and projected population trends and demographics both locally (pp. 93, 118) and region-wide (p. 93) that show increasing use numbers over time. The planning team is charged with considering a statewide perspective when determining potential recreational facilities for a state park. The *State Park System Plan 2002, Part I: A System for the Future*, a Department publication based on recent statewide recreation planning, says “Rapid growth throughout California is putting unprecedented demands on the [park] system”, and “The state’s population grew 25% between 1987 and 2002, but visitors to state parks increased more than 50% in the same time period” (p. ii). This document also contains an inventory of statewide recreational facilities as of 2002 and projects the minimum number needed to reasonably accommodate future demand. It states, “Demand is so high that if the Department were to add 325 camp sites a year, it would not keep up with requests” (p. ii). Latent demand for camping, trail hiking, and picnicking in developed sites are on the public’s list of top ten priorities for funding in state parks (p. 10).

The Department’s Marin District parks staff report having to commonly turn away prospective campers and day-users during peak-use times. The minimal facilities proposed for the park in the General Plan should help fill some of these current and future unmet demands.

- 13.3** Thank you for your comment on staffing and budgeting. Please see **Response 4.1** for further information on staffing and budgeting.
- 13.4** The General Plan qualitatively describes park problems (e.g. erosion, water quality, exotic species, sensitive species, estuary loss, and forest senescence) and provides broad guidelines for future more detailed assessments and remediation of these problems. Adverse environmental conditions will be taken into consideration when the General Plan proposals are scheduled for implementation. Please refer to **Response 3.1** for more information regarding the Heart’s Desire Beach restroom and **Response 8.8** for text revisions and more information regarding water quality.

MCBC
MARIN COUNTY
BICYCLE COALITION



www.marinbike.org

P.O. Box 35
San Anselmo, CA 94979
voice (415) 456-3469
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March 12, 2004

Mr. Bob Hare
California State Parks, Northern Service Center
P.O. Box 942896
Sacramento, CA 94296-0001

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MAR 15 2004

NORTHERN SERVICE CENTER

**Re: Comments on the Preliminary General Plan/Draft Environmental
Impact Report for Tomales Bay State Park**

Dear Mr. Hare:

The Marin County Bicycle Coalition (MCBC) appreciates the opportunity to submit comments on the Preliminary General Plan/Draft Environmental Impact Report for Tomales Bay State Park.

The MCBC is a non-profit organization that was founded in 1998 to promote safe bicycling for everyday transportation and recreation. We promote bicycling as a way to improve public health, increase recreational opportunities, decrease traffic congestion, improve the environment, and provide benefits for public safety.

As a result of attending the February 24, 2004 public informational meeting, MCBC has a greater appreciation of the challenge faced in planning for seven disconnected land parcels that comprise the Tomales Bay State Park. We applaud the stated desire to "coordinate the planned uses of these parcels so they can, as much as possible, function as a whole despite their separation."

MCBC's specific interests are the accessibility and safety accommodations within the park for bicycle and pedestrian visitors. A large user group of the Tomales Bay State Park and throughout West Marin are bicyclists, although their needs are minimally addressed in the draft report. The following comments are intended to help clarify the needs of bicyclists and pedestrians, and to provide design guidelines that will accommodate them effectively throughout the park.

1. Pedestrian Crossings

- Wherever parkland is accessible to pedestrians (trails, paths, etc.) on BOTH sides of Highway 1, pedestrian crossings should be located every .25 miles. Any further interval than this and pedestrians may cross at unsafe, unmarked locations.
- Pedestrian crossings should utilize up-to-date crossing treatments consistent with the rural and natural character of the park. High-visibility "ladder" type pavement crosswalks and advance warning signs are recommended to warn motorists of the possible presence of pedestrians.

14.1

Promoting Safe Bicycling for Everyday Transportation and Recreation

2. Bicycle Parking

- It is essential to provide adequate secure bicycle parking for visitors arriving by bicycles. Provision of bike racks encourages visitors to ride instead of driving, thus lessening impact the on fragile public lands and the environment.
- Bicycle parking should be located as close as possible to the cyclists' destination. If bicycle parking is more than 20-30 feet from a destination, cyclists may ride past racks and lock up to other objects such as signs or trees. This may also encourage cyclists to ride in inappropriate or illegal areas.
- Bicycle parking is especially important at locations where cyclists arrive by bicycle to engage in another activity. This includes hiking, boating, swimming, bird-watching, camping, etc.
- Many companies provide secure bicycle parking for recreational uses. Examples of possible fixtures and placements can be found under the bicycle parking products listing at www.creativepipe.com.

14.1

3. Automobile Parking

- If possible, a net REDUCTION in the number of total car parking spaces would help to encourage visitors to arrive by biking or walking. In general, 20 bicycles can fit within the space of one automobile parking space.
- Where automobile parking is to be "improved," consider alternative lot treatments such as plantable pavers and permeable/pervious concrete/asphalt surfaces in lieu of traditional asphalt which can exacerbate runoff problems into Tomales Bay.

4. We encourage planning and analysis of including an off-street path that runs the length of the 12-mile linear park to ensure safe bicycle access. Walking and bicycling along this main route should be incorporated as a primary means of improving the aesthetic experience of this corridor for all users. Consider using permeable trail surfaces such as those being experimented with by the NPS at the Red Barn to reduce environmental impact and runoff issues.

5. Develop a park-wide proposal to address the need for alternative transportation options to access the park and circulate within it. This would include promoting walking, bicycling and transit services to offset private automobile impacts.

14.2

6. Wherever possible and where appropriate for transportation purposes, make bicycle access a priority on roads and trails within the parklands.

7. Encourage walking and bicycling as a mitigation for the impacts of motor vehicles on the park.

8. Improve the "Growth-Inducing Impacts" of the plan by positively impacting the local fitness economy. Encouraging cycling along the Highway 1 corridor through the park will greatly benefit small businesses – gift shops, cafes, restaurants – in the nearby communities.

14.3

9. Recognize that bicycling and walking – especially in conjunction with proposed transit partnerships – are viable modes for accessing and circulating within the park. The statement, “Most of the visitors will arrive by private vehicle” (pg. 46) should not be accepted as confirming the status quo and abdicating from the need to encourage other modes.

14.4

10. The opportunity for individual camping should be preserved at Heart's Desire Beach. At least 1-2 hike/bike campsites should be preserved here to encourage visitors to arrive by foot or bicycle. Limit vehicle access to the existing beach parking lot, with the exception of a limited number of ADA-accessible sites at the proposed new individual campgrounds. Requiring some walking to access the campsites will help preserve the wilderness experience of camping, as well as encourage walking within the park as a form of transportation.

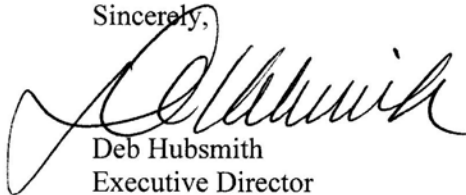
14.5

* * * * *

The Marin County Bicycle Coalition applauds the work you have done on this planning document. We are available to answer any questions you have regarding our comments, and welcome your feedback. You can reach me at 415-456-3469 x1#.

Thank you for consideration of our comments. We look forward to hearing back from you and to increasing opportunities for people to access Tomales Bay State Park on foot and by bicycle.

Sincerely,



Deb Hubsmith
Executive Director

Cc: Senator John Burton
Assemblyman Joe Nation
Marin County Board of Supervisors, c/o Supervisor Kinsey, President

Response to Letter 14

Deb Hubsmith, Marin County Bicycle Coalition

March 12, 2004

14.1 The Department thanks commenter for the design suggestions regarding issues of particular concern to bicyclists in the area. The General Plan is a document that outlines a vision for the park's future and recommends possible facilities and programs to achieve this vision. After the General Plan is approved, and when funding becomes available, the projects proposed in the plan will be implemented based on further evaluation of the proposed development sites. At that time, specific design elements such as those proposed in commenter's letter, including the possibility of reducing the number of parking spaces to encourage alternative travel modes, will be considered and determined.

14.2 The General Plan, in its Parkwide Goals and Guidelines for Recreation Activities and Facilities and Visitor Experience, Services, and Safety section (p. 146), recommends specific guidelines for encouraging alternate modes of transportation to access and circulate throughout the park. See Guidelines ACC-3, ACC-4, and ACC-5 on page 147.

The General Plan, in its Environmental Analysis section determined that the impacts from increased traffic due to its proposals will not be significant (see pages 226–227 for a description of potential traffic impacts from plan proposals). However, the plan does make recommendations to encourage bicycle, public transit, and other types of transportation alternatives to access the park.

14.3 The General Plan presents guidelines for encouraging the use of bicycles and other alternative transportation modes in accessing and circulating through the park. See **Response 14.2** above for further discussion of this issue.

The General Plan's Environmental Analysis - Growth-Inducing Impacts section (p. 217) discusses the potential impacts of plan proposals on the region's economy, including potential positive effects of these proposals on local businesses.

14.4 The General Plan recommends guidelines that encourage the use of bicycles and other modes of non-vehicular transportation in accessing and circulating through the park. See **Response 14.2** for more information on this issue.

14.5 Individual campsites have never existed at Heart's Desire Beach. The Hike-Bike campground in the Heart's Desire Area near the Vista Point

picnic area was closed for various reasons (please see **Response 7.4** for more information on this topic).

The General Plan recommends development of walk-in campsites at the proposed campground near the park entrance in the Heart's Desire Area, if appropriate, and also at the proposed walk-in campground at Marconi Cove.

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March 12, 2004

California State Parks
Northern Service Center
ATTN: Bob Hare
P.O.Box 942896
Sacramento CA 94296-0001

RECEIVED

MAR 15 2004

SCH #2003062074

NORTHERN SERVICE CENTER

Dear Mr. Hare,

The Preliminary General Plan/Draft EIR for Tomales Bay State Park is a remarkable document---a well-crafted, detailed evaluation of the existing conditions of the Park's properties, the inherent values necessary for Park stewardship of these properties, and the potential modification and/or addition of park facilities. There is also an equally remarkable disconnect between the majority of this document and an apparently singular pursuit of the introduction of car camping to the Heart's Desire planning area.

The Draft eloquently describes the "Spirit of Place" and the profound natural aesthetic values of the Heart's Desire area, and then proposes a development that is fundamentally antithetical to these values. This planning document correctly acknowledges that there is a "carrying capacity" where ecological and sociological values of the Park can be negatively effected by the volume or intensity of human use, yet proceeds to champion the creation of a new facility that would hugely effect this environment 24/7 in a potentially fully mechanized/motorized fashion. After supporting the need to recognize the concept of a carrying capacity, the Draft recommends that this concept should be evaluated in the "post-general plan phases" of development. The more logical approach would be to complete the big-picture consideration of the Park's carrying capacity and perhaps even consider limitations on use prior to conceptually approving a spectrum of developments and facilities. In the Heart's Desire Area Management Vision and the Guidelines for the Park's Aesthetic Qualities, both cite the importance of non-mechanized and non-vehicular forms of recreation, the Draft then promotes a Preferred Alternative that includes a drive-in camp-ground with all its mechanized accessories.

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15.2

The examination of the impacts of the proposed car camping facility is deficient in a number of ways, many of which begin with a mischaracterization of the potential density and type of use this facility could entail. By the

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Park's current code, fifteen campsites could actually mean 30 vehicles and 120 people permitted in this facility. Speaking with local park personnel, the realities of camping facilities include the natural tendencies to squeeze extra campers and vehicles into a campsite that is already "full" and the additional "in-transit" camping that occurs in and around a formal campground (particularly given the locked-gate program at Heart's Desire). The need for a full-time campground host further elevates the density and impacts of this "small, low-impact drive-in campground."

Car camping physically allows campers to bring along all the toys and the predominant accessory in car camping today is the portable generator to power TV's radios, video games, microwaves, etc. At the public information meeting on February 24 we heard conflicting information from the Project Manager that the planning team did not "envision" this facility as one that would include the use of generators and from the District Chief Ranger that generators are permitted in all State Park campgrounds (though for practical reasons they only see them in car camping facilities) and that this policy is statewide and not subject to variances. A car camping facility means generators at Heart's Desire and the planning document does not adequately address the obvious noise impacts on both wildlife and aesthetic values as the planning team acknowledged this aspect of the proposed use change was not considered.

15.2

Delineations of the potential impacts of the car camping proposal are also incomplete as the proposal fails to address how campers will access the beach. Given the steep terrain between this part of the Park and the beach and the Park's requirement that new trail construction be of 6%-or-less grade, access to and from the new campground will require: 1) a very switched-backed trail with significant impacts of its own, 2) the inappropriate and potentially dangerous pedestrian use of the current road to the beach, or 3) the increased dependence on vehicular transportation. Any one (or combination) of these options requires additional assessments of impacts. Given the vacation-orientation of a campground, planners should recognize that night-time beach parties will be common and that the after-hours traffic will go from virtually non-existent to a low-volume, high frequency use pattern. The effects of this change will need to be evaluated on its impacts to both wildlife and aesthetic values of this area.

15.3

15.4

The Draft does not adequately address the potential impacts of this development on the Heart's Desire water system. As acknowledged in the description of Existing Conditions, the water supply for the entire Heart's Desire complex comes from a well in the middle of the Boneyard. The proposed placement of

15.5

the new campground and a septic system to service a substantial amount of waste (a local septic engineer suggests that 40 gallons per camper per day is the current planning standard; 40gpd x 120 campers = 4,800 gallons of waste-water per day) would both threaten the existing water supply and most probably require that the well be relocated. As the Inverness Public Utility District has found, wells in the Inverness area are very marginal as dependable water sources; the Draft itself also notes the scarcity of groundwater in the area. The EIR needs to address the potential impacts to the current water supply and the feasibility and potential impacts of siting a large new septic field, the relocation of the well, the presumable need for additional water tanks for storage, and how these changes in facilities and use will alter the Park's ability to adequately address wildfire control.

15.5

The Draft maintains that there is a growing demand for recreational access to TBSP in general and specifically a deficit in car camping facilities on public property. The Tomales Bay Guidelines for Protection and Use (NPS 2001) sites visitation figures that show visitation to the area has actually plateaued for much of the last ten years, perhaps reflecting a natural carrying capacity by the infrastructure or maybe a less tangible set of limitations. Anecdotal summation of the Point Reyes National Seashore's current revision of their General Management Plan shows no public demand for car camping in the more than 1000 comments they have received. It could be argued that the Visitor Survey that was part of the State Park's planning effort was skewed by a choice of only a positive response to the possibility of establishing a campground. If a tally was made of all the Surveys that did not have a check on that first item ("Develop a 10-20 site drive-in campground...") and was compared to the number of those that were checked, it is fair to say that there was a favorable response to the concept of car camping? A more meaningful and level format to this Survey would have been a yes/no choice next to each possibility.

15.6

I am dismayed by the State Park's apparent intent to introduce car camping to Heart's Desire, regardless of a clear, strong public voice that this area of Tomales Bay State Park be maintained as a "quiet refuge." The intent seems to be conspicuous as the Draft's Preferred Alternative and the two action Alternatives (as opposed to the No Project Alternative) offer the choice between car camping, car camping, and car camping. CEQA requires that a reasonable range of project alternatives be offered and I believe that the Preliminary General Plan/Draft EIR fails in this regard. Heart's Desire in its current state seems a model of a heavily used and immensely enjoyed State Parks facility that has nonetheless maintained its values as a sanctuary for both the natural

15.7

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and human elements. I urge the Planning Team to reconsider a Preferred Alternative that would so profoundly alter the character of the existing park facility that by all measures is such a remarkable jewel in the State Parks system.

Very sincerely,



Thomas G Baty

Additional comments on SCH #2003062074

Restoration of Natural Outlet of the Heart's Desire Beach Estuary (HD-4)

What is meant by "restoration" of the natural outlet? The proposal needs to define the purpose and goals for this project, describing the hydrologic and habitat values that such a project would seek to restore, acknowledging what current habitats would be changed or lost, and providing critical details such as what is meant by "natural outlet" and where the project foresees "realigning" the creek. This area has been identified as critical habitat for protected species (California red-legged frog) and as noted in the Draft, is potential habitat for a number of others, yet does not have the benefit of a full biological survey. The purpose, design details, and practical implications of significantly modifying a streamcourse and historic wetland area needs to be considerably more developed before conceptual approval of this project is given.

15.8

Improve Picnic Areas (HD-6)

The redesign of the picnic area should begin with the complete relocation of the restroom facility. With the restroom itself less than 50 feet from the beach and the leach lines immediately adjacent to the stream, water quality concerns should mandate that this facility (or at very least, the leachfield) be moved. The current restrooms unfortunate siting on a Coastal Miwok midden should seem to make relocation of this facility of serious cultural significance.

15.9

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By the very nature of the Heart's Desire recreation area, the summertime "beach" weekends---Memorial Day, 4th of July, Labor Day--- as well as periods of warm weather are those times that this facility is at or beyond full user capacity (as defined by the parking areas). Not surprisingly, these are the times this facility has shown it is insufficient to handle the loads of peak usage. This system needs to be redesigned and built to peak usage performance standards rather than "normal" or average use volumes.

15.9

Enhance North Dream Farm property (INV-2)

The potential habitat values along the Dream Farm stream, identified in the Draft as Montane Riparian, seem to warrant greater consideration as a potential habitat restoration project. As acknowledged in the Draft, this entire property is northern spotted owl habitat, which should bolster the case for habitat preservation/restoration. A complete biological survey, including a wetland delineation would be extremely useful before more use facilities are considered for this area.

15.10

Park Concessions (CON-1)

While the Park does not currently provide recreational activities through private concessionaires, a number of for-profit companies enjoy considerable access and benefits from the Park. Whether or not the Park has formal concessionaire contracts with companies operating in the Park, the Park should consider whether "marketing" the Tomales Bay State Park experience is beneficial to park values in the long run and should consider the possibilities of limiting commercial exploitation of the Park as well as cost-sharing additional management burdens with those enterprises that benefit from Park access.

15.11

Submitted 3/12/04



Response to Letter 15

Thomas G. Baty

March 12, 2004

- 15.1** The Planning Team sought to define, as much as possible in this programmatic planning document (see **Responses 7.1 and 8.2** for more information regarding this type of plan), appropriate levels of recreational use in several planning areas based on existing resource documentation and preliminary estimates of possible resource impacts in these areas. In some areas, proposed parking lot sizes have defined acceptable ranges of numbers of users. However, future assessments of park resources, potential in-park and regional traffic impacts, and assessments of other possible impacts from proposed projects recommended in the plan will be conducted as part of future specific project implementation.
- 15.2** Please refer to **Response 3.3** regarding changes to the General Plan's Guideline HD-8 concerning the drive-in campground in the Heart's Desire Area.
- 15.3** The Environmental Analysis has determined that the recommendations of the General Plan will not cause potentially significant impacts to existing traffic within or outside of the park. Please refer to **Response 3.6** for a further discussion of beach access and parking.
- 15.4** Operational use of gates, signage, and enforcement will prevent or regulate nighttime beach access by campers. The long history of camping at the former "Hike-Bike" campground, which is closer to the beach than the proposed upper campground, did not cause significant nighttime beach use problems.
- 15.5** The General Plan proposes potential recreation goals for a site; however, at the time of implementation of these proposals, further evaluations of site elements such as utilities are completed to help determine the actual size and locations of facilities for that site. Please refer to **Response 3.3** and **Response 3.5** for a discussion of the proposed campground in the Heart's Desire Area and water source availability.
- 15.6** Please refer to **Response 13.2** for a discussion of existing and projected demand for recreational opportunities, including camping, in West Marin and statewide. The Department acknowledges commenter's opinion of the design of the surveys conducted as part of this General Plan. The Department believes the design is valid.
- 15.7** As the commenter indicates, all of the Environmental Analysis alternatives include the small drive-in campground. There is a deficit of drive-in

camping opportunities on public lands in West Marin (and generally statewide) and this type of recreational opportunity is an important objective of the General Plan. Please see the “Planning Influences and Issues – Camping” section of the General Plan on page 111 for further description of the current camping situation in West Marin. Please see **Response 8.3** for more information regarding General Plan Alternatives. Please see **Response 3.3** for more information regarding the proposed drive-in campground. Please see **Response 3.7** for more information regarding text revisions to Guideline HD-8, Develop Small Drive-in Campground above the Entrance Station.

- 15.8** The General Plan proposes potential recreation and resource restoration goals for a site; however, at the time of implementation of these proposals, further resource assessments, such as biological and wetland evaluations, may be done to help determine the appropriate number and locations of facilities or restoration for that site.
- 15.9** The Department considered the option of removing the existing Heart’s Desire restroom to protect the archeological site it was built upon in the early 1960s, but determined that removal would have more detrimental impact on the site than leaving it where it is. Please refer to **Response 3.1** for the revised text to Guideline HD-13, Upgrade Heart’s Desire Beach Restroom Waste Disposal System.
- 15.10** Please refer to **Response 15.8** regarding resource assessments.
- 15.11** The General Plan recommends potential types of concessions (see page 151). Concessions are considered in cases where the Department is not able to provide needed and appropriate recreational support in a park unit. The current use of a park by commercial interests at Tomales Bay State Park is addressed mainly at the Department’s North Bay District.